

TSD File Inventory Index

Date: December 5, 2000

Initial: CMK/enc/ed

Facility Name: <u>Herkel Surface Technologies, Inc. (Parker Division)</u>			
Facility Identification Number: <u>MD 057 676 124</u>			
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FEB 16 2000

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Budnik
Regulatory Affairs Manager
Henkel Surface Technologies
32100 Stephenson Highway
Madison Heights, Michigan 48071

Re: Letter of Acknowledgment
Henkel Surface Technologies
U.S. EPA ID No.: MID 057 676 124

Dear Mr. Budnik:

On December 10, 1999, the United States Environmental Protection Agency (U.S. EPA) issued Henkel Surface Technologies a Notice of Violation (NOV) which identified violations of Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial Wastes, of the Michigan Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, and Subtitle C of the Federal Resource Conservation and Recovery Act of 1976 (RCRA), as amended. Specifically Michigan Administrative Code (MAC) Rule 299.9304(d) and Rule 299.9813 and Title 40 of the Code of Federal Regulations, Part 279, Section 54, (40 C.F.R. §279.54). U.S. EPA received your January 18, 2000, response to that NOV. This letter is to inform you that U.S. EPA has reviewed your response and determined that no further enforcement action will be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the NREPA and RCRA, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Michigan Department of Environmental Quality in the future.

-2-

If you have any questions and/or concerns regarding this matter, please contact Ms. Diane Sharrow, of my staff, at (312)886-6199.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Mark Daniels, DEQ, WMD, Livonia District Office

bcc: D. Sharrow, USEPA
Section File
Branch File

LEGEND:DE-9J:Sharrow:DMS:6-6199:Houghton_ack.ltr:020400

DEC 07 1999

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George J. Beyer, Manager
Henkel Surface Technologies
32100 Stephenson Highway
Madison Heights, Michigan 48071

DE-9J

Re: NOTICE OF VIOLATION
Henkel Surface Technologies
U.S. EPA ID. NO. MID 057 676 124

Dear Mr. Beyer:

On September 21, 1999, the United States Environmental Protection Agency (U.S. EPA) and the Michigan Department of Environmental Quality (DEQ) conducted a joint Compliance Evaluation Inspection (CEI) of the Henkel Surface Technologies site located in Madison Heights, Michigan. The purpose of the CEI was to evaluate the compliance of Henkel Surface Technologies with Part 111, Hazardous Waste Management, and Part 121, Liquid Industrial Wastes, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA); and any administrative rules or regulations promulgated pursuant to these Acts. A copy of the completed CEI checklists can be obtained by contacting Ms. Diane Sharrow at the U.S. EPA, or Mr. Mark Daniels at the DEQ.

Based on a review of the manifests and other records made available to U.S. EPA and DEQ during the CEI, the inspectors determined that Henkel Surface Technologies is a large quantity generator, because it generated over 1000 kilograms of hazardous waste in at least one month. In addition, U.S. EPA and DEQ found that Henkel Surface Technologies, Madison Heights, Michigan, had violated the following rules:

Rule 307(1) (a/k/a MAC R. 299.9307(1)) - Henkel Surface Technologies had copies of the waste analysis for the non-hazardous filter press sludge, but did not have analytical data for waste streams such as obsolete and off-specification products, ignitable waste solvents and paints from research and development, lab packs and waste water treatment heavy metal reduction precipitation. You must submit copies of your waste evaluations for the past three years.

Rules 306 (1), (1)(b), (1)(c) (a/k/a MAC R. 299.9306 (1), (1)(b), (1)(c)) - Henkel Surface Technologies does not have a permit or interim status and failed to have all containers (3 in the storage area and 2 in the satellite accumulation area) marked with: the accumulation date; the words hazardous waste; and the hazardous waste number. It was impossible to determine whether you had exceeded the 55-gallon limit in the satellite accumulation area and whether the drums had been moved to the storage area when required. In addition, it was impossible to determine if more than 90 days had elapsed since the date the containers in both areas should have been marked with an accumulation date, because the weekly inspection logs or reports for both storage areas for the past three years had not been completed or were not available. The above violations are almost identical to the violations found on February 20, 1991, when Henkel Surface Technologies was last inspected for compliance with the state and federal hazardous waste regulations. You must submit documentation that Henkel Surface Technologies is now meeting all of the conditions for an exemption to the requirement that storage can take place only under a permit or interim status, pursuant to Rule 306. You must also submit copies of the weekly inspection logs for the past three years.

Rule 306 (1)(a) (a/k/a MAC R. 299.9306 (1)(a)) [40 CFR 262.34(a)(1) and 265.171, 265.172, 265.173(a) and (b), 265.174, 265.176 and 265.177] - Henkel Surface Technologies does not have a permit or interim status. The storage area was in disarray. It was difficult to access the storage area, view the containers and read the labels. Containers were stored on and near broken pallets that hindered the inspectors' movement and access. It was impossible to determine for the majority of the containers which containers held hazardous waste and which containers held non-hazardous waste, and whether the waste and containers were compatible. There was one open, unlabeled pail. There was one drum with no waste codes. There were two drums with no start dates. There were no records of inspection for the past three years. Once again, the above violations are almost identical to the violations found on February 20, 1991, when Henkel Surface Technologies was last inspected for compliance with the state and federal hazardous waste regulations. You must submit documentation that Henkel Surface Technologies is now meeting all of the conditions for an exemption to the requirement that storage can take place only under a permit or interim status, pursuant to Rule 306 (1)(a) (which references 40 CFR 262 and 265). You must also submit copies of the weekly inspection logs for the past three years.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.16] - Henkel Surface Technologies personnel training records did not contain the job titles, job descriptions and the name of each employee filling each job. Your staff indicated that all laboratory and maintenance staff are trained, but there were no specific records that listed job titles, job descriptions and the name of each employee filling the job. You must submit this documentation.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.32] - Henkel Surface Technologies did not have documentation that an adequate volume of water or foam for fire control, was available. You must submit documentation that this requirement has been met.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.34(a) and (b)] - Henkel Surface Technologies did not have an internal alarm or communication device available in the satellite accumulation area. You must provide documentation that internal alarms have been installed and this violation has been corrected.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.35] - Henkel Surface Technologies did not have adequate aisle space in the storage area for the unobstructed movement of personnel and emergency equipment. You must submit documentation that this has been corrected and that adequate aisle space will be maintained at all times.

Rule 1003 (1)(o) (a/k/a MAC R. 299.11003(1)(o) [40 CFR 265.37(a) and (b) and 265.53 © and (d)] - Henkel Surface Technologies had no description of arrangements made with local authorities for emergency response and services, and the Contingency Plan did not contain the addresses of the emergency coordinators. You must submit documentation of your arrangements with local authorities, and that you have included the addresses of the emergency coordinators in the Contingency Plan.

Rule 205 (a/ka/ MAC R. 299.9205) [40 CFR 273] - Henkel Surface Technologies staff were uncertain about how paint filters, electric lamps and waste devices containing mercury were characterized and managed. You must submit documentation regarding the characterization and management of these wastes.

This Notice of Violation does not preclude, nor limit, the U.S. EPA's or the DEQ's ability to initiate any other enforcement action, under Federal or State law, as deemed appropriate. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), U.S. EPA may, among other things, issue an Order assessing a civil penalty for any past, or current, violation requiring

compliance immediately or within a specified time period. Although this letter is not such an Order, Henkel Surface Technologies should take prompt action to correct all violations and come into compliance if it has not already done so.

You are hereby requested to submit a written response, that includes the documentation listed above, to the U.S. EPA no later than 30 days from the certified receipt of this letter. The written response should document all past and current actions taken to establish compliance with the above requirements.

If you have any questions or concerns regarding this matter, please contact Ms. Sharrow, of my staff, at 312-886-6199.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Mark Daniels, DEQ, WMD, Livonia District Office

bcc: Compliance File
Section File
Author
Paul Little

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 CHIEF	ECAB BRANCH CHIEF
<i>DSH</i> <i>12/3/99</i>	<i>WJ</i> <i>12/3/99</i>	

DE-9J:DSHARROW:12/1/99 F:\USER\DSHARROW\Henkel.NOV



FINDING NUMBER ONE (1)

- ANALYTICAL DATA (SAMPLES)
- CONTAINER WASTE APPROVAL REPORT

CONTAINER WASTE APPROVAL REPORT

REPORT DATE: 12/17/99

Page 1

REPORT TIME: 8:42 am

APPROVAL #	GENERATOR	WASTE COMMON NAME	UNIT PRICE	PER	EXP. DATE
✓ 102324.6	HENKEL SURFACE TECHNOLOGIES	WASTE SOLID SOAPS	Drum		7/06/00
✓ 102327.6	CC HENKEL SURFACE TECHNOLOGIES	WASTE PAINT SOLVENTS (TOLUENE/MEK)	Drum		3/29/00
✓ 102417.6	HENKEL SURFACE TECHNOLOGIES	WASTE THERMINOL 55	Drum		10/08/00
✓ 103067.6	HENKEL SURFACE TECHNOLOGIES	EPOXY/ACRYLIC WASTE	DRUM		3/29/00
✓ 104376.6	CC HENKEL SURFACE TECHNOLOGIES	AUTOPHORETIC 800 SERIES	DRUM		3/29/00
✓ 104376B.6	CC HENKEL SURFACE TECHNOLOGIES	AUTOPHORETIC 800 SERIES			3/29/00
✓ 105909B.6	HENKEL SURFACE TECHNOLOGIES	P3 HI-LITE 2494 <i>CK exp. 12/00</i>	PAIL		11/22/00
✓ 106505.6	CC HENKEL SURFACE TECHNOLOGIES	PETROL OILS/PAINT/SOLVENT (MEK/XYLENE/ACETONE)	DRUM		3/29/00
✓ 106521.10	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS	DRUM		4/06/00
✓ 106521.11	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- ISOCYANATE WASTE	DRUM		4/06/00
✓ 106521.12	HENKEL SURFACE TECHNOLOGIES	LAB PACK NON REGULATED LIQUID/SOLID			4/08/00
✓ 106521.17	HENKEL SURFACE TECHNOLOGIES	LAB PACK NON RCRA REGULATED TOXIC LIQUID/SOLIDS	DRUM		4/08/00
✓ 106521.7	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- NON CHLORINATED FLAMMABLE LIQUID	DRUM		4/06/00
✓ 106521B.1	HENKEL SURFACE TECHNOLOGIES	DISCARDED OBSOLETE VIRGIN LAB CHEMICAL	PAIL		4/06/00
✓ 106521B.13	HENKEL SURFACE TECHNOLOGIES	LAB PACK WATER REACTIVE SOLIDS	PAIL		4/08/00
✓ 106521B.15	HENKEL SURFACE TECHNOLOGIES	LAB PACK ELEMENTAL MERCURY	PAIL		4/08/00
✓ 106521B.16	HENKEL SURFACE TECHNOLOGIES	LAB PACK CYANIDE SOLUTIONS	PAIL		4/08/00
✓ 106521B.6	HENKEL SURFACE TECHNOLOGIES	LAB PACKS - OXIDIZERS	PAIL		4/06/00
✓ 106521E.5	HENKEL SURFACE TECHNOLOGIES	LAB PACK- RCRA TOXIC LIQUIDS/SOLIDS	DRUM		4/06/00
✓ 106521E.8	C HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE HIGH PH LIQUID	DRUM		4/06/00
✓ 106521F.2	HENKEL SURFACE TECHNOLOGIES	LAB PACK- HIGH PH CLEANERS	DRUM		4/06/00
✓ 106521F.3	HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS	DRUM		4/06/00
✓ 106521F.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK- LOW PH LIQUIDS	DRUM		4/06/00
✓ 106523B.6	HENKEL SURFACE TECHNOLOGIES	EPOXY RESIN, SOLID	PAIL		4/30/00
✓ 106529.6	HENKEL SURFACE TECHNOLOGIES	NON-REG LIQS/SOLIDS	DRUM		4/30/00
✓ 106529B.6	HENKEL SURFACE TECHNOLOGIES	NON-REG LIQS/SOLIDS	PAIL		4/30/00
✓ 106529J.6	HENKEL SURFACE TECHNOLOGIES	NON-REG LIQS/SOLIDS	CUBIC YARD		4/30/00
✓ 106769.6	HENKEL SURFACE TECHNOLOGIES	PETROLEUM BASED CLEANER (BENZENE)	DRUM		7/02/00
✓ 106769B.6	HENKEL SURFACE TECHNOLOGIES	PETROLEUM BASED CLEANER (BENZENE)	PAIL		7/02/00
✓ 106770.6	HENKEL SURFACE TECHNOLOGIES	CHROMIC ACID BASED CLEANER	DRUM		7/02/00
✓ 106770B.6	HENKEL SURFACE TECHNOLOGIES	CHROMIC ACID BASED CLEANER	PAIL		7/02/00
✓ 106771.6	HENKEL SURFACE TECHNOLOGIES	VINYL POLYMER (VINYLIDENE CHLORIDE, VINYL CHLORIDE)	DRUM		7/02/00
✓ 106771B.6	HENKEL SURFACE TECHNOLOGIES	VINYL POLYMER (VINYLIDENE CHLORIDE, VINYL CHLORIDE)	PAIL		7/02/00
✓ 106772.12	HENKEL SURFACE TECHNOLOGIES	LAB PACK-TOXIC ORGANIC LIQUIDS	DRUM		7/02/00
✓ 106772.13	HENKEL SURFACE TECHNOLOGIES	LAB PACK-4,4-DIPHENYLMETHANE DIISOCYANATE	DRUM		7/02/00
✓ 106772.14	HENKEL SURFACE TECHNOLOGIES	LAB PACK- TOXIC SOLIDS	DRUM		7/02/00
✓ 106772.5	HENKEL SURFACE TECHNOLOGIES	LAB PACK-LEAN FUEL	DRUM		7/02/00
✓ 106772.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK- FLAMMABLE LIQUIDS	DRUM		7/02/00
✓ 106772B.2	HENKEL SURFACE TECHNOLOGIES	LAB PACK-ORGANIC PEROXIDES	DRUM		7/02/00
✓ 106772B.3	HENKEL SURFACE TECHNOLOGIES	LAB PACK-FLAMMABLE SOLID	DRUM		7/02/00
✓ 106772B.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK-SELF HEATING SOLIDS	DRUM		7/02/00
✓ 106772B.7	HENKEL SURFACE TECHNOLOGIES	LAB PACK-ACIDIC LIQUIDS, FLAMMABLE	DRUM		7/02/00
✓ 106772B.8	HENKEL SURFACE TECHNOLOGIES	LAB PACK- MERCURY THERMOMETERS	DRUM		7/02/00
✓ 106772B.9	HENKEL SURFACE TECHNOLOGIES	LAB PACK-CAUSTIC LIQUID WITH LOW CONC. CYANIDE	DRUM		7/02/00
✓ 106772E.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK-OXIDIZING LIQUID	DRUM		7/02/00
✓ 106772F.10	HENKEL SURFACE TECHNOLOGIES	LAB PACK-ORGANIC CAUSTICS	DRUM		7/02/00
✓ 72F.11	HENKEL SURFACE TECHNOLOGIES	LAB PACK, INORGANIC ACIDIC LIQUIDS WITH Hg	DRUM		7/02/00
✓ 12J.15	HENKEL SURFACE TECHNOLOGIES	LAB PACK-NON REGULATED LIQUIDS/SOLIDS	DRUM		7/02/00
✓ 106793.6	HENKEL SURFACE TECHNOLOGIES	ION EXCHANGE BEADS	DRUM		7/21/00
✓ 106828.6	HENKEL SURFACE TECHNOLOGIES	WASTE OIL EMULSIONS	DRUM		7/27/00

CONTAINER WASTE APPROVAL REPORT

REPORT DATE: 12/17/99

Page 2

REPORT TIME: 8:42 am

APPROVAL #	GENERATOR	WASTE COMMON NAME	UNIT PRICE	PER	EXP. DATE
✓ 107025.6	HENKEL SURFACE TECHNOLOGIES	TIN HYDROXIDE	DRUM		10/07/00
✓ 107026.6	HENKEL SURFACE TECHNOLOGIES	COMP B LOW FLASH LIQ	DRUM		10/06/00
✓ 107026B.6	HENKEL SURFACE TECHNOLOGIES	COMP B LOW FLASH LIQ	PAIL		10/06/00
✓ 107027.6	HENKEL SURFACE TECHNOLOGIES	COMP A NEUT ORG LIQ	DRUM		10/06/00
✓ 107027B.6	HENKEL SURFACE TECHNOLOGIES	COMP A NEUT ORG LIQ	PAIL		10/06/00
✓ 107059.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW PH LIQUIDS	DRUM		10/06/00
✓ 107059.5	HENKEL SURFACE TECHNOLOGIES	LAB PACK, HIGH PH LIQUIDS	DRUM		10/06/00
✓ 107059B.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK, TOXIC LIQUIDS, ISOCYANATES AND PEST.	DRUM		10/06/00
✓ 107059B.2	HENKEL SURFACE TECHNOLOGIES	LAB PACK, CHROMIC ACID SOLID	PAIL		10/06/00
✓ 107059F.3	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW FLASH LIQUIDS	DRUM		10/06/00
✓ 107059J.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK, NON REGULATED LIQUID AND SOLIDS	ONE YARD BOXES		10/06/00
✓ 107060B.6	HENKEL SURFACE TECHNOLOGIES	DIETHYLENTRIAMINE	PAIL		10/06/00
✓ 107061B.6	HENKEL SURFACE TECHNOLOGIES	LIQUID EPOXY RESIN	PAIL		10/06/00
✓ 107062.6	HENKEL SURFACE TECHNOLOGIES	ACRYLIC COPOLYMER	55 GALLON DRUM		10/06/00
✓ 107062B.6	HENKEL SURFACE TECHNOLOGIES	ACRYLIC COPOLYMER	PAIL		10/06/00
✓ 107063B.6	HENKEL SURFACE TECHNOLOGIES	SURFACTANTS W/BARIUM	PAIL		10/06/00
✓ 107089.6	HENKEL SURFACE TECHNOLOGIES	EPOXY/ACRYLIC WASTE (BENZENE)	DRUM		10/18/00
✓ 107091.6	HENKEL SURFACE TECHNOLOGIES	WASTE PETROLEUM OILS (VINYL CHLORIDE)	DRUM		10/19/00
✓ 107237.2 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK NON CHLORINATED FLAMMABLE SOLVENTS	CUBIC YARD		11/22/00
✓ 107237B.10	HENKEL SURFACE TECHNOLOGIES	LAB PACK CYANIDE	PAIL		11/22/00
✓ 107237B.8	HENKEL SURFACE TECHNOLOGIES	LAB PACK ELEMENTAL MERCURY	PAIL		11/22/00
✓ 107237B.9	HENKEL SURFACE TECHNOLOGIES	LAB PACK FLAMMABLE SOLID	PAIL		11/22/00
✓ 107237E.6	HENKEL SURFACE TECHNOLOGIES	LAB PACK OXIDIZING SOLIDS	DRUM		11/22/00
✓ 107237E.7	HENKEL SURFACE TECHNOLOGIES	LAB PACK, LOW PH LIQUIDS	CONTAINERS		11/22/00
✓ 107237F.3 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK FLAMMABLE LIQUIDS WITH AMINES, CLORINATED	DRUM		11/22/00
✓ 107237F.4	HENKEL SURFACE TECHNOLOGIES	LAB PACK TOXIC LIQUIDS/SOLIDS	30 GALLON DRUM		11/22/00
✓ 107237F.5 C	HENKEL SURFACE TECHNOLOGIES	LAB PACK CAUSTIC LIQUID, FLAMMABLE	30 GALLON DRUM		11/22/00
✓ 107237J.1	HENKEL SURFACE TECHNOLOGIES	LAB PACK-NON REGULATED	CUBIC YARD		11/22/00
✓ 107274B.6	HENKEL SURFACE TECHNOLOGIES	NON-CHLOR FLAMM SOLV PROD MIX (BENZENE/PETROL NAP)	DRUM		11/22/00
✓ 107275.6	HENKEL SURFACE TECHNOLOGIES	BONDERLUBE 235, 235H (SODIUM NITRITE)			11/22/00
✓ 107276.6	HENKEL SURFACE TECHNOLOGIES	NITRATE SOLNS (CALCIUM NITRATE/AMMONIUM NITRATE)			11/22/00

COPY

DYNECOL, INC

6520 GEORGIA STREET
DETROIT, MICHIGAN 4821
PHONE: (313) 571-714
FAX: (313) 571-719

Recertification: ☒ Y ☐ N

WASTE APPROVAL FORM

Approval # 102327 6

Code 1390

I GENERAL INFORMATION

Customer: HENKEL SURFACE TECHNOLOGIES	Generator: SAME
Address: 32100 STEPHENSON HWY	Address: SAME
City: MADISON HTS	City:
State: MI Zip Code: 48071	State: Zip Code:
Contact: D. LEMBKE	Contact: GEORGE BEYER (Jack Krummer)
Phone #: 2485839300 Fax: 589-4838	Phone #: Fax:
24 hour phone #:	EPA ID: MID057676124

II WASTE DESCRIPTION

Waste Common Name: Waste Paint Solvents

Specific Process Generating the Waste: ACCUMULATION OF PAINT + SPENT SOLVENTS USED FOR THEIR SOLVENT PROPERTIES

WASTE COMPOSITION must equal 100%:

	ACTUAL %	MIN.	MAX.
<u>PAINT</u>		<u>30</u>	<u>50</u>
<u>LEK</u>		<u>10</u>	<u>30</u>
<u>TRICHLOROETHYLENE</u>	<u>41</u>		
<u>ACETONE</u>		<u>5</u>	<u>15</u>
<u>XYLENE</u>		<u>10</u>	<u>20</u>

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen ☒ Y ☒ N Oxidizer ☒ Y ☒ N Organics ☒ Y ☒ N Explosives ☒ Y ☒ N Phenols ☒ Y ☒ N Hexavalent Chromium ☒ Y ☒ N
Radioactives ☒ Y ☒ N Poison ☒ Y ☒ N PCBs ☒ Y ☒ N Pesticides ☒ Y ☒ N

As defined in 40 CFR 268: ☒ Non-wastewater ☐ Wastewater **LIQUID** SOLID SLURRY

Sample submitted to Dynecol: ☒ Y ☐ N Color: _____

III RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 451 or EPA 40 CFR 261: Yes ☒ No ☐

If yes, list all waste codes: F005, F003, F001, D001, D035, D040

This is a non-hazardous waste as defined by Michigan Act 451: Yes ☐ No ☐

If yes, list all waste codes: _____

This waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D013 through D043:

Yes ☒ No ☐ Unknown ☐

If ☐ list all waste codes: _____

* If based on generator knowledge, please read and understand certification in Section VI

IV SHIPPING INFORMATION

Waste Volume: 1 - 10 UNITS: (circle one) GALLONS POUNDS DRUMS OTHER
 Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

2Q, WASTE FLAMMABLE LIQUID, n.o.s. (METHYL ETHYL KETONE)

DOT Hazard Class: 3 UNNA Number: UN1993 Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER
 Generator Name (Please print or type)

George J. Beyer
 Generator Signature

3 29 94
 Date
Technical Manager
 Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH, and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
 - PCBs, HECs (Method 9020), Nickel and Thallium
 - TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
 - Michigan metals: Copper and Zinc
- (The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ * MSDS _____

* _____ Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

Approval #: 1023276

Treatment Facility: _____ CMF: ✓

Approved by: [Signature]

Date: _____

Expiration date: 3/29/00

CERTIFICATION FORM

(Submit with waste approval package)

UNDERLYING CONSTITUENTS/VOLATILE ORGANIC COMPOUNDS (VOC)

APPROVAL NUMBER: 102327.6 EPA ID NUMBER: MID057676124

GENERATOR NAME: HENKEL SURFACE TECHNOLOGIES

EPA HAZARDOUS WASTE NUMBERS: FD05, F003, F001, D001, T035, D042

MANIFEST NUMBER (IF APPLICABLE): _____

PLEASE PLACE A CHECK MARK IN THE APPROPRIATE BOX:

- ☐ THIS WASTE IS NOT PROHIBITED FROM LAND DISPOSAL. (NOTE - ADDITIONAL CERTIFICATIONS MAY BE REQUIRED)
- ☒ THIS WASTE IS PROHIBITED FROM LAND DISPOSAL.
- ☒ THE WASTE DOES NOT CONTAIN UNDERLYING HAZARDOUS CONSTITUENTS LISTED IN 40 CFR 268.48 TABLE UTS-UNIVERSAL TREATMENT STANDARDS, EXCLUDING FLUORIDE, VANADIUM AND/OR ZINC.
- ☐ THE WASTE DOES CONTAIN UNDERLYING HAZARDOUS CONSTITUENTS LISTED IN 40 CFR 268.48 TABLE UTS-UNIVERSAL TREATMENT STANDARDS, EXCLUDING FLUORIDE, VANADIUM AND/OR ZINC.
- ☐ THE WASTE DOES NOT CONTAIN VOLATILE ORGANIC COMPOUNDS GREATER THAN 500 PPM.
- ☒ THE WASTE DOES CONTAIN VOLATILE ORGANIC COMPOUNDS GREATER THAN 500 PPM.

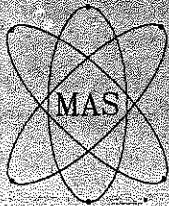
NOTE: ADDITIONAL INFORMATION AS REQUIRED PER 40 CFR 263.7 GENERAL PAPERWORK REQUIREMENTS TABLE CAN BE FOUND IN THE ATTACHED DYNECOL WASTE APPROVAL FORM.

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE WASTE THROUGH ANALYSIS AND TESTING OR THROUGH KNOWLEDGE OF THE WASTE, AND BELIEVE THAT THE INFORMATION I SUBMITTED IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING A FALSE CERTIFICATION, INCLUDING A POSSIBILITY OF A FINE AND/OR IMPRISONMENT.

George Beyer
AUTHORIZED SIGNATURE

GEORGE BEYER
PRINTED NAME

3/25/89
DATE



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Detroit, Michigan 48201

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Phone: 1-800-801-4MAS (MI only)
: (313) 964-3680
Fax No: (313) 964-2339

Date : 23-Mar-99
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 90311037
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample I.D. : 102327.6 WASTE PAINT SOLVENTS (TOLUENE/MEK)

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the sample(s) received. Midwest is not responsible data interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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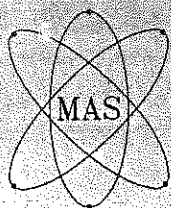
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- 3. Results relate only to the items tested.*
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)*
ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)
- 5. QC information on file.*

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Ed Harrison
Quality Manager ext. 111



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IN: NWB

TEST REPORT

MAS #: 90311037

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 23-Mar-99
P.O. #: 115-4349

PROJECT: HENKEL SURFACE TECHNOLOGIES

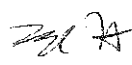
SAMPLE IDENTIFICATION: 102327.6 WASTE PAINT SOLVENTS (TOLUENE/MEK)

PHYSICAL DESCRIPTION: LIQUID

Sample Date: 11-Mar-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	98	°F	---	< 140 D001	FH	03/16/99	
SW-846 9040B	*pH / CORROSIVITY	6.55	UNITS	---	<2 : >12.5 D002	FH	03/12/99	
	REACTIVITY:							
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003	HL	03/15/99	
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003	FH	03/15/99	
SW-846 9020BM	TOTAL ORGANIC HALOGENS	270	mg/kg	100	---	BA	03/12/99	
SW-846 8082	PCB:		mg/kg		---	GM	03/18/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			MV		
6010A	ARSENIC	N/D		1.0	5.0 D004		03/18/99	
6010A	BARIUM	N/D		10	100 D005		03/18/99	
6010A	CADMIUM	N/D		0.50	1.0 D006		03/18/99	
6010A	CHROMIUM	N/D		1.0	5.0 D007		03/18/99	
6010A	LEAD	N/D		5.0	5.0 D008		03/18/99	
7470A	MERCURY	N/D		0.10	0.2 D009		03/17/99	
6010A	SELENIUM	N/D		0.50	1.0 D010		03/18/99	
6010A	SILVER	N/D		1.0	5.0 D011		03/18/99	

* SAMPLE pH MEASURED AT 25°C.


J. Harrison
Quality Manager ext. 111

Recertification: ☒ Y ☐ N

WASTE APPROVAL FORM

Approval # 102324.6

Code 1390

I GENERAL INFORMATION

Customer: <u>PARKER ARKHEM</u>	Generator: <u>SAME</u>
Address: <u>32100 STEPHENSON HWY</u>	Address: <u>32100 STEPHENSON HWY</u>
City: <u>MADISON HEIGHTS</u>	City: <u>MADISON HEIGHTS</u>
State: <u>MI</u> Zip Code: <u>48071</u>	State: <u>MI</u> Zip Code: <u>48071</u>
Contact: <u>DELORES LEMBKE</u>	Contact: <u>GEORGE BEYER</u>
Phone #: <u>(510) 553-9300</u> Fax: <u>(510) 559-4534</u>	Phone #: <u>(510) 553-9300</u> Fax: <u></u>
24 hour phone #: <u></u>	EPA ID#: <u>MID 057 676 124</u>

II WASTE DESCRIPTION

Waste Common Name: Waste Solid Soaps

Specific Process Generating the Waste: Lubricant (Sodium Stearate) used for metal forming

WASTE COMPOSITION (must equal 100%):	ACTUAL %	MIN.	MAX.
<u>Sodium Stearate</u>		<u>5</u>	<u>10</u>
<u>Water</u>		<u>90</u>	<u>95</u>
<u>Metals (Fe, Zn, Cu, Mg, Li)</u>			<u>0.2</u>

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen	Y <input checked="" type="radio"/> N	Oxidizer	Y <input checked="" type="radio"/> N	Organics	Y <input checked="" type="radio"/> N	Explosives	Y <input checked="" type="radio"/> N	Phenols	Y <input checked="" type="radio"/> N	Hexavalent Chromium	Y <input checked="" type="radio"/> N
Radioactives	Y <input checked="" type="radio"/> N	Poison	Y <input checked="" type="radio"/> N	PCBs	Y <input checked="" type="radio"/> N	Pesticides	Y <input checked="" type="radio"/> N				

As defined in 40 CFR 268: ☒ Non-wastewater () Wastewater **LIQUID** **SOLID** **SLURRY**

Sample submitted to Dynecol: Y ☒ N ☐ Color:

III RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes ☐ No ☒

If yes, list all waste codes:

This is a non-hazardous waste as defined by Michigan Act 136: Yes ☒ No ☐

If 029L list all waste codes:

The waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

Yes ☐ No ☒ * Unknown ☐

If yes, list all waste codes:

IV SHIPPING INFORMATION

Waste Volume: 5-10 UNIT: (circle one) GALLONS POUNDS DRUMS OTHER _____

Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

non-haz waste liquid

DOT Hazard Class: _____ UNNA Number: _____ Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER
Generator Name (Please print or type)

George J. Beyer
Generator Signature

7/6/99
Date
Technical Manager
Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW-846):

- Flash, pH and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
 - PCBs, HECs Method 9020, Nickel and Thallium
 - TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
 - Michigan metals: Copper and Zinc
- (The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ MSDS _____

* _____ Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

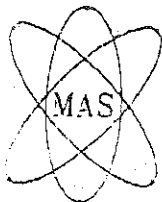
Approval #: 102324.6

Treatment Facility: _____ CMF: ✓

Approved by: (3)

Date: _____

Expiration date: 7/6/00

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Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

Date : 19-Jul-99

Client : MOLLY DWINNELLS
: DYNECOL, INC.

Mas# : 90712002

PROJECT: : HENKEL SURFACE TECHNOLOGIES

Sample ID. : 102324.6 WASTE SOLID SOAPS

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pm=parts per million, mg/l, mg/kg or mg/kg(dry weight)

ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)

5. QC information on file.

6. EQL=Estimated Quantitation Limit.

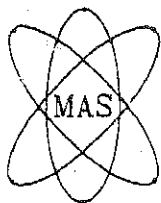
7. N/A=Not Applicable.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Charles Hindbaugh

Charles Hindbaugh
Lab. Quality Manager ext. 115



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TEST REPORT

MAS #: 90712002

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 19-Jul-99

P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

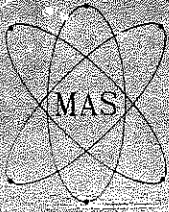
Sample Date: 09-Jul-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	°F	---	< 140 D001	DD	07/16/99	
SW-846 9045C	*pH / CORROSIVITY	8.78	UNITS	---	<2 : >12.5 D002	NW	07/13/99	
	REACTIVITY:					NW	07/13/99	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003			
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003			
SW-846 9020EM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	SK	07/13/99	
SW-846 E082	PCB:		mg/kg		---	CBH	07/13/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	ICLP METALS (1311):		mg/l			MY	07/15/99	
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6010A	SILVER	N/D		1.0	5.0 D011			

* SAMPLE pH MEASURED IN WATER AT 22°C.

Charles Hindbaugh

Charles Hindbaugh
Quality Manager ext. 115



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: DYNECOL, INC.
Mas# : 90712002
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Sample I.D. : 102324.6 WASTE SOLID SOAPS

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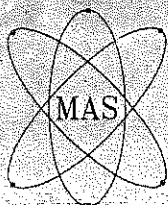
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Thanking You,

Charles Hindbaugh

Charles Hindbaugh
Lab. Quality Manager ext. 1157



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TEST REPORT

MAS #: 90712002

MOLLY DWINNELLS

DYNECOL, INC.

6520 GEORGIA

DETROIT, MI 48211

DATE COMPLETED: 19-Jul-99

P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 09-Jul-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	°F	---	< 140 D001	DD	07/16/99	
SW-846 9045C	*pH / CORROSIVITY	8.78	UNITS	---	<2 : >12.5 D002	NW	07/13/99	
	REACTIVITY:					NW	07/13/99	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003			
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003			
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	SK	07/13/99	
SW-846 8082	PCB:		mg/kg		---	CBH	07/13/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
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6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6010A	SILVER	N/D		1.0	5.0 D011			

* SAMPLE pH MEASURED IN WATER AT 22°C.

Charles Hindbaugh

Charles Hindbaugh

Lab. Quality Manager ext. 115

EMERGENCY PHONE: (513) 482-2297

CHEMTREC 800-424-9300

MSDS REFERENCE: EMERY 5451 (1/15/97)

SECTION I - IDENTIFICATION

WARNING! CAUSES EYE IRRITATION!
AVOID CONTACT WITH EYES. WASH THOROUGHLY AFTER HANDLING.

PRODUCT: **APG* 325 N**
* APG IS A REGISTERED TRADEMARK OF HENKEL CORPORATION

SYNONYMS: **ALKYL POLYGLYCOSIDE SURFACTANT**

CHEMICAL: **D-GLUCOPYRANOSIDE, C9-11 ALKYL, OLIGOMERIC**

CAS NO: **132778-08-6**

SARA HAZARD: **ACUTE (SECTION 311/312)**
TITLE III SECTION 313- NOT LISTED

SECTION II - INGREDIENTS AND HAZARD CLASSIFICATION

COMPOSITION	%	PEL/TLV	HAZARD
ALKYL POLYGLYCOSIDE (132778-08-6)	50	NONE/NONE	EYE IRRITANT
WATER (7732-18-5)	AP. 50	NONE/NONE	NONE

SECTION III - HEALTH INFORMATION

INHALATION: **NO DATA AVAILABLE**

INGESTION: **ACUTE ORAL LD50: > 5.0 G/KG IN MALE AND FEMALE SPRAGUE-DAWLEY RATS.**

EYE CONTACT: **0.1 ML OF PRODUCT WAS INSTILLED INTO THE EYES OF SIX RABBITS. AFTER A 21-DAY OBSERVATION PERIOD THE MAXIMUM TOTAL EYE IRRITATION SCORES RANGED FROM 59-78 (SCALE 0-110). THE MATERIAL PRODUCED SEVERE IRRITATION AND CORNEAL OPACITY WHICH PERSISTED THROUGH DAY 21. NO EVIDENCE OF CORROSION WAS NOTED.**

SKIN CONTACT: **THE PRIMARY SKIN IRRITATION SCORE WAS 1.2 (RABBIT) (SCALE 0-8). THE MATERIAL WAS CLASSIFIED AS A MILD SKIN IRRITANT.**

THE ACUTE DERMAL LD50 VALUE WAS GREATER THAN 2.0 G/KG IN MALE AND FEMALE NEW ZEALAND WHITE RABBITS.

RECEIVED

MAY 04 1998

SECTION IV - OCCUPATIONAL EXPOSURE LIMITS

PEL: NO OSHA PEL

TLV: NO ACGIH TLV

SECTION V - EMERGENCY FIRST AID PROCEDURE

FOR OVEREXPOSURE BY SWALLOWING: CALL A PHYSICIAN OR POISON CONTROL CENTER PROMPTLY.

FOR OVEREXPOSURE BY SKIN CONTACT: IMMEDIATELY FLUSH SKIN WITH PLENTY OF WATER WHILE REMOVING CONTAMINATED CLOTHING.

FOR OVEREXPOSURE BY EYE CONTACT: IMMEDIATELY FLUSH EYES WITH PLENTY OF COOL WATER FOR AT LEAST 15 MINUTES. DO NOT LET VICTIM RUB EYES. GET MEDICAL ATTENTION IMMEDIATELY.

FOR OVEREXPOSURE BY INHALATION: IMMEDIATELY REMOVE VICTIM TO FRESH AIR. IF VICTIM HAS STOPPED BREATHING GIVE ARTIFICIAL RESPIRATION, PREFERABLY BY MOUTH-TO-MOUTH. GET MEDICAL ATTENTION IMMEDIATELY.

SECTION VI - PHYSICAL DATA

BOILING POINT: >212 DEG F

MELTING POINT: NOT DETERMINED

VAPOR PRESSURE: NOT DETERMINED

SPECIFIC GRAVITY: 1.1

VAPOR DENSITY (AIR=1): NOT DETERMINED

SOLUBILITY IN WATER: MISCIBLE

APPEARANCE AND COLOR:

CLEAR, VISCOUS, LIGHT-YELLOW LIQUID; MILD CHARACTERISTIC ODOR

SECTION VII - FIRE AND EXPLOSION HAZARDS

FLASH POINT & METHOD USED: >200 DEG F (>93 DEG C) (CLOSED CUP)

AUTO-IGNITION TEMPERATURE: NOT DETERMINED

FLAMMABLE LIMITS IN AIR, % BY VOL. LOWER: NOT DETERMINED

FLAMMABLE LIMITS IN AIR, % BY VOL. UPPER: NOT DETERMINED

NFPA RATING: NO NFPA RATING

HMIS RATING: HEALTH (2) FIRE (1) REACTIVITY (0)

SPECIAL FIRE FIGHTING PROCEDURES & PRECAUTIONS

THIS PRODUCT WILL PRODUCE FOAM WHEN MIXED WITH WATER. (INDIVIDUALS SHOULD PERFORM ONLY THOSE FIRE FIGHTING PROCEDURES FOR WHICH THEY HAVE BEEN TRAINED). USE WATER SPRAY, DRY CHEMICAL, FOAM OR CARBON DIOXIDE. USE WATER TO KEEP FIRE-EXPOSED CONTAINERS COOL. IF A SPILL OR LEAK HAS NOT IGNITED, USE WATER SPRAY TO DISPERSE THE VAPORS. WATER SPRAY MAY BE USED TO FLUSH SPILLS AWAY FROM FIRE AND TO DILUTE SPILLS TO NONFLAMMABLE MIXTURES.

UNUSUAL FIRE & EXPLOSION HAZARDS

FIREFIGHTERS SHOULD WEAR SELF-CONTAINED BREATHING APPARATUS IN THE POSITIVE-PRESSURE MODE WITH A FULL FACEPIECE WHEN THERE IS A POSSIBILITY OF EXPOSURE TO SMOKE, FUMES OR HAZARDOUS DECOMPOSITION PRODUCTS.

SECTION VIII - REACTIVITY

STABILITY:

GENERALLY STABLE

HAZARDOUS POLYMERIZATION:

NONE LIKELY

CONDITIONS & MATERIALS TO AVOID:

AVOID CONTACT WITH STRONG ACIDS AND OXIDIZING AGENTS.

HAZARDOUS DECOMPOSITION PRODUCTS:

DECOMPOSITION MAY PRODUCE CARBON MONOXIDE AND CARBON DIOXIDE.

SECTION IX - EMPLOYEE PROTECTION

CONTROL MEASURES:

HANDLE IN THE PRESENCE OF ADEQUATE VENTILATION.

RESPIRATORY PROTECTION:

RECOMMENDED EXPOSURE LIMITS (i.e., OSHA-PEL AND ACGIH-TLV) HAVE NOT BEEN ESTABLISHED FOR THIS MATERIAL. WHETHER THERE IS A NEED FOR RESPIRATORY PROTECTION UNDER YOUR CONDITIONS OF HANDLING OF THIS MATERIAL SHOULD BE EVALUATED BY A QUALIFIED HEALTH SPECIALIST.

PROTECTIVE CLOTHING:

WEAR GLOVES AND PROTECTIVE CLOTHING WHICH ARE IMPERVIOUS TO THE PRODUCT FOR THE DURATION OF ANTICIPATED EXPOSURE IF THERE IS POTENTIAL FOR PROLONGED OR REPEATED SKIN CONTACT.

EYE PROTECTION:

WEAR SAFETY GLASSES MEETING THE SPECIFICATIONS OF ANSI STANDARD Z87.1 WHERE NO CONTACT WITH THE EYE IS ANTICIPATED. CHEMICAL SAFETY GOGGLES MEETING THE SPECIFICATIONS OF ANSI STANDARD Z87.1 SHOULD BE WORN WHENEVER THERE IS THE POSSIBILITY OF SPLASHING OR OTHER CONTACT WITH THE EYES.

SECTION X - ENVIRONMENTAL PROTECTION

ENVIRONMENTAL PRECAUTIONS:

AVOID UNCONTROLLED RELEASES OF THIS MATERIAL. WHERE SPILLS ARE POSSIBLE, A COMPREHENSIVE SPILL RESPONSE PLAN SHOULD BE DEVELOPED AND IMPLEMENTED.

SPILL OR LEAK PRECAUTIONS:

WEAR APPROPRIATE RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING AS DESCRIBED IN SECTION IX. CONTAIN SPILLED MATERIAL. TRANSFER TO SECURE CONTAINERS. WHERE NECESSARY, COLLECT USING ABSORBENT MEDIA. IN THE EVENT OF AN UNCONTROLLED RELEASE OF THIS MATERIAL, THE USER SHOULD DETERMINE IF THE RELEASE IS REPORTABLE UNDER APPLICABLE LAWS AND REGULATIONS.

WASTE DISPOSAL:

ALL RECOVERED MATERIAL SHOULD BE PACKAGED, LABELED, TRANSPORTED, AND DISPOSED OR RECLAIMED IN CONFORMANCE WITH APPLICABLE LAWS AND REGULATIONS AND IN CONFORMANCE WITH GOOD ENGINEERING PRACTICES. AVOID LANDFILLING OF LIQUIDS. RECLAIM WHERE POSSIBLE.

SECTION XI - REGULATORY CONTROLS

DEPARTMENT OF TRANSPORTATION:

DOT CLASSIFICATION: NOT REGULATED

DOT PROPER SHIPPING NAME:

OTHER DOT INFORMATION:

OTHER REGULATORY REQUIREMENTS:

LISTED IN TSCA INVENTORY

CERCLA HAZARDOUS MATERIALS:

NONE NOTED

SECTION XII - PRECAUTIONS: HANDLING, STORAGE AND USAGE

SPILLED MATERIAL MAY BE SLIPPERY. CLEAN UP SPILLS IMMEDIATELY BEFORE WALKING IN SPILL AREA.

The information presented herein is believed to be factual as it has been derived from the works and opinions of persons believed to be qualified experts; however, nothing contained in this information is to be taken as a warranty or representation for which Henkel Corporation bears legal responsibility. The user should review any recommendations in the specific context of the intended use to determine whether they are appropriate.

PREPARED BY: ROBERT E. BORGERDING

DATE: 1/15/97

SUPERSEDES:

Henkel Corporation, Chemicals Group
4900 Este Avenue
Cincinnati, Ohio 45232

WHITE TO YELLOW CRYSTALLINE POWDER AND CHUNKS
 PHYSICAL PROPERTIES
 MELTING POINT: 54 C TO 56 C
 FLASHPOINT 177 F
 80C

SECTION 10. - - - - - STABILITY AND REACTIVITY - - - - -
 INCOMPATIBILITIES

STRONG OXIDIZING AGENTS
 HAZARDOUS COMBUSTION OR DECOMPOSITION PRODUCTS
 TOXIC FUMES OF:
 CARBON MONOXIDE, CARBON DIOXIDE
 NITROGEN OXIDES

SECTION 11. - - - - - TOXICOLOGICAL INFORMATION - - - - -
 ACUTE EFFECTS

MAY BE HARMFUL BY INHALATION, INGESTION, OR SKIN ABSORPTION.
 MAY CAUSE EYE IRRITATION.
 MAY CAUSE SKIN IRRITATION.
 TO THE BEST OF OUR KNOWLEDGE, THE CHEMICAL, PHYSICAL, AND
 TOXICOLOGICAL PROPERTIES HAVE NOT BEEN THOROUGHLY INVESTIGATED.

SECTION 12. - - - - - ECOLOGICAL INFORMATION - - - - -
 DATA NOT YET AVAILABLE.

SECTION 13. - - - - - DISPOSAL CONSIDERATIONS - - - - -
 THIS COMBUSTIBLE MATERIAL MAY BE BURNED IN A CHEMICAL INCINERATOR
 EQUIPPED WITH AN AFTERBURNER AND SCRUBBER.

OBSERVE ALL FEDERAL, STATE AND LOCAL ENVIRONMENTAL REGULATIONS.

SECTION 14. - - - - - TRANSPORT INFORMATION - - - - -
 CONTACT ALDRICH CHEMICAL COMPANY FOR TRANSPORTATION INFORMATION.

SECTION 15. - - - - - REGULATORY INFORMATION - - - - -
 DATA NOT AVAILABLE

SECTION 16. - - - - - OTHER INFORMATION - - - - -
 THE ABOVE INFORMATION IS BELIEVED TO BE CORRECT BUT DOES NOT PURPORT TO
 BE ALL INCLUSIVE AND SHALL BE USED ONLY AS A GUIDE. SIGMA, ALDRICH,
 FLUKA SHALL NOT BE HELD LIABLE FOR ANY DAMAGE RESULTING FROM HANDLING
 OR FROM CONTACT WITH THE ABOVE PRODUCT. SEE REVERSE SIDE OF INVOICE OR
 PACKING SLIP FOR ADDITIONAL TERMS AND CONDITIONS OF SALE.
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M A T E R I A L S A F E T Y D A T A S H E E T

CIBA-GEIGY CORPORATION

PIGMENTS DIVISION

315 WATER STREET

NEWPORT, DE 19804

(800) 355-CIBA, OR -2422 OR

DIRECT:(302) 633-2060, OR -2061

EMERGENCY PHONE NUMBER:

(800) 888-8372

SECTION I-IDENTITY INFORMATION

IDENTITY (TRADENAME): UNISPERSE GREEN G-EN

FAMILY/CHEMICAL NAME:

COPPER PHTHALOCYANINE

C.I. PIGMENT GREEN 7

C.I. NO. 74260

PRODUCT TYPE:

AQUEOUS PIGMENT DISPERSION.

HAZARD STATEMENT :

* THIS MATERIAL SAFETY DATA SHEET (MSDS) HAS BEEN *
* PREPARED IN COMPLIANCE WITH THE FEDERAL OSHA HAZARD *
* COMMUNICATION STANDARD 29 CFR 1910.1200. *
* THIS PRODUCT IS CONSIDERED TO BE A HAZARDOUS *
* CHEMICAL UNDER THAT STANDARD. *

SECTION II-HAZARDOUS INGREDIENTS

SPECIFIC CHEMICAL NAME:

PROPRIETARY EYE IRRITANT

CAS #: PROPRIETARY

COMMON NAME: PROPRIETARY

EXPOSURE LIMITS:

OSHA PEL: NOT ESTABLISHED

ACGIH TLV: NOT ESTABLISHED

CARCINOGENICITY:

THIS CHEMICAL HAS NOT BEEN REVIEWED FOR CARCINOGEN-
ICITY BY NTP, IARC, OR OSHA.

UNISPERSE GREEN G-EN

SECTION III-PHYSICAL DATA

APPEARANCE AND ODOR:
GREEN LIQUID, ODORLESS
BOILING POINT:
100C
FREEZING POINT:
< 0C
DECOMPOSITION TEMPERATURE:
>200C.
SOLUBILITY IN WATER:
MISCIBLE
SPECIFIC GRAVITY:
1.3 G/CM3

SECTION IV-FIRE AND EXPLOSION HAZARD DATA

FLASH POINT:
NOT APPLICABLE.
FLAMMABLE LIMITS IN AIR-LOWER:
NOT APPLICABLE.
FLAMMABLE LIMITS IN AIR-UPPER:
NOT APPLICABLE.
EXTINGUISHING MEDIA:
CARBON DIOXIDE, DRY CHEMICAL, FOAM, WATER.
FIRE FIGHTING PROCEDURES-SPECIAL:
USE SELF-CONTAINED BREATHING APPARATUS.
UNUSUAL FIRE AND EXPLOSION HAZARDS:
DECOMPOSITION AND COMBUSTION PRODUCTS MAY BE TOXIC.

SECTION V-REACTIVITY DATA

STABILITY:
STABLE.
CONDITIONS TO AVOID:
SENSITIVE TO TEMPERATURES BELOW -10C (+14F). AVOID TEMPERATURES ABOVE 60C (140F).
HAZARDOUS POLYMERIZATION:
WILL NOT OCCUR.

SECTION VI-HEALTH HAZARD DATA

PRIMARY ROUTES OF EXPOSURE:
DERMAL, INHALATION.
OVEREXPOSURE EFFECTS:
PRODUCT CONTAINS GREATER THAN 1% OF AN INGREDIENT FOUND TO BE AN EYE IRRITANT.
THE PRESERVATIVE IN THIS PRODUCT IS A SKIN SENSITIZER. THOUGH IT IS PRESENT AT A CONCENTRATION LESS THAN 1%, INDIVIDUALS ALREADY SENSITIZED TO THIS BENZISOTHIAZOLINONE - CONTAINING PRESERVATIVE SHOULD EXERCISE CARE IN HANDLING.
MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE:

UNISPERSE GREEN G-EN

SEE OVEREXPOSURE EFFECTS.

EMERGENCY AND FIRST AID PROCEDURES-EYES:

FOR EYE CONTACT, FLUSH EYES WITH PLENTY OF WATER FOR SEVERAL MINUTES. GET MEDICAL ATTENTION IF IRRITATION OCCURS.

EMERGENCY AND FIRST AID PROCEDURES-SKIN:

FOR SKIN CONTACT, WASH AFFECTED AREAS WITH PLENTY OF WATER, AND SOAP, IF AVAILABLE, FOR SEVERAL MINUTES. GET MEDICAL ATTENTION IF IRRITATION OCCURS.

EMERGENCY AND FIRST AID PROCEDURES-INGESTION:

IF SWALLOWED, GIVE AT LEAST 3-4 GLASSES OF WATER BUT DO NOT INDUCE VOMITING. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSING PERSON.

EMERGENCY AND FIRST AID PROCEDURES-INHALATION:

IF INHALED, REMOVE FROM AREA TO FRESH AIR. GET MEDICAL ATTENTION IF RESPIRATORY IRRITATION DEVELOPS OR IF BREATHING BECOMES DIFFICULT.

SECTION VII-SPILL OR LEAK PROCEDURES

SPILL PROCEDURES:

WEAR PROTECTIVE CLOTHING SPECIFIED BELOW. ISOLATE SPILL AREA. ABSORB ONTO SAND OR OTHER ABSORBENT MATERIAL. SHOVEL INTO CLOSABLE CONTAINER FOR DISPOSAL.

WASTE DISPOSAL METHODS:

DISPOSE IN ACCORDANCE WITH FEDERAL, STATE AND LOCAL REGULATIONS.

SECTION VIII-SPECIAL PROTECTION INFORMATION

VENTILATION:

WORK IN WELL VENTILATED AREAS. DO NOT BREATHE MISTS OR VAPORS.

PROTECTIVE GLOVES:

AS WITH ANY INDUSTRIAL CHEMICAL, UNNECESSARY SKIN CONTACT SHOULD BE AVOIDED. IMPERVIOUS GLOVES RECOMMENDED.

EYE PROTECTION:

WEAR SAFETY GLASSES OR GOGGLES.

RESPIRATORY PROTECTION:

USE NIOSH RESPIRATORS AS NEEDED TO MITIGATE EXPOSURE.

SECTION IX-SPECIAL PRECAUTIONS

HANDLING, SHIPPING AND STORING PRECAUTIONS:

WARNING! EYE IRRITANT.

AVOID CONTACT WITH EYES, SKIN AND CLOTHING. AVOID BREATHING DUST, MIST OR VAPORS. USE ONLY WITH ADEQUATE VENTILATION. WASH HANDS AND FACE THOROUGHLY BEFORE EATING, DRINKING, OR USING TOBACCO PRODUCTS.

KEEP ABOVE 32F. KEEP CONTAINER CLOSED WHEN NOT IN USE. FOR INDUSTRIAL USE ONLY.

SECTION X- REGULATORY INFORMATION

TRANSPORTATION:

NOT REGULATED.

SARA/TITLE III - TOXIC CHEMICALS LIST:

THIS PRODUCT DOES NOT CONTAIN A TOXIC CHEMICAL FOR ROUTINE
ANNUAL 'TOXIC CHEMICAL RELEASE REPORTING' UNDER SEC. 313
(40 CFR 372).

TSCA INVENTORY STATUS:

ALL CHEMICAL COMPONENTS ARE LISTED ON THE TSCA INVENTORY.
PENNSYLVANIA RIGHT-TO-KNOW ACT:

THE FOLLOWING IS REQUIRED COMPOSITION INFORMATION.

CHEMICAL NAME : C.I. PIGMENT GREEN 7
CAS NUMBER : 1328-53-6
COMMENTS : ENVIRONMENTAL HAZARD.
* * *

CHEMICAL NAME : SPECIFIC CHEMICAL IDENTITY OF THIS COMPONENT
IS BEING WITHHELD AS TRADE SECRET.

GENERIC NAME : SURFACTANT
COMMENTS : NOT ON PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.
* * *

CHEMICAL NAME : 1,2-PROPANEDIOL
CAS NUMBER : 57-55-6
COMMON NAME : 1,2-PROPYLENE GLYCOL
COMMENTS : HAZARDOUS SUBSTANCE.
* * *

CHEMICAL NAME : WATER
CAS NUMBER : 7732-18-5
COMMON NAME : WATER
COMMENTS : NOT ON PENNSYLVANIA HAZARDOUS SUBSTANCE LIST.
* * *

PLEASE NOTE:

- OUR PRODUCTS ARE INTENDED FOR INDUSTRIAL USE ONLY ! THIS -
- MATERIAL IS NOT INTENDED FOR USE IN PRODUCTS FOR WHICH -
- PROLONGED CONTACT WITH MUCOUS MEMBRANES OR ABRADED SKIN -
- OR IMPLANTATION WITHIN THE HUMAN BODY IS SPECIFICALLY -
- INTENDED. CIBA-GEIGY CORPORATION IS NOT ABLE TO RECOM- -
- MEND THIS MATERIAL AS SAFE AND EFFECTIVE FOR SUCH USES -
- AND ASSUMES NO LIABILITY FOR SUCH USE. -

ISSUE DATE: [REDACTED] REVISION: 05C

FOR FURTHER INFORMATION, PLEASE CONTACT: DR. EVA M. VARY

THE INFORMATION AND RECOMMENDATIONS CONTAINED HEREIN ARE
BASED UPON DATA BELIEVED TO BE CORRECT. HOWEVER, NO GUARANTEE
OR WARRANTY OF ANY KIND EXPRESSED OR IMPLIED IS MADE WITH
RESPECT TO THE INFORMATION CONTAINED HEREIN.

UNISPERSE GREEN G-EN



DYNECOL, INC

5520 GEORGIA STREET
DETROIT, MICHIGAN 482
PHONE: (313) 571-7114
FAX: (313) 571-7114

Recertification: (Y) N

WASTE APPROVAL FORM

Approval # 102324.6

Code 1390

I GENERAL INFORMATION

Customer: PARKER ARCHEM Generator: SAME
Address: 32100 STEPHENSON HWY Address: 32100 STEPHENSON HWY
City: MADISON HEIGHTS City: MADISON HEIGHTS
State: MI Zip Code: 48071 State: MI Zip Code: 48071
Contact: DELORES LEMBEKE Contact: GEORGE BEYER
Phone #: (313) 553-7300 Fax: (313) 559-4834 Phone #: (313) 553-7300 Fax:
24 hour phone #: EPA ID#: MID 057 676 122

II WASTE DESCRIPTION

Waste Common Name: Waste Solid Soaps
Specific Process Generating the Waste: Lubricant (Sodium Stearate) used for metal forming

STE COMPOSITION (must equal 100%)

	ACTUAL %	MIN.	MAX.
Sodium Stearate		5	10
Water		90	95
Metals (Fe, Zn, Cu, Mg, Li)			0.2

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen Y (N) Oxidizer Y (N) Organics Y (N) Explosives Y (N) Phenols Y (N) Hexavalent Chromium Y (N)
Radioactives Y (N) Poison Y (N) PCBs Y (N) Pesticides Y (N)

As defined in 40 CFR 268: (X) Non-wastewater () Wastewater LIQUID SOLID SLURRY

Sample submitted to Dynecol: Y N Color: _____

II RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes _____ No (X)

If yes, list all waste codes: _____

This is a non-hazardous waste as defined by Michigan Act 136: Yes (X) No _____

If yes, list all waste codes: 029L

Waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:
a. No (X) Unknown _____

If yes, list all waste codes: _____

Based on generator knowledge, please read and understand certification in Section VI

IV SHIPPING INFORMATION

Waste Volume: 5-10 UNITS (circle one) GALLONS POUNDS DRUMS OTHER

Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 171.101:

non-haz waste liquid

DOT Hazard Class:

UNNA Number:

Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

7 1 6 99

Date

George J. Beyer

Generator Signature

Technical Manager

Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW-846):

- Flash pH and Reactivity (Detection limit of 10ppm for Cyanide and Sulfide)
- PCs, HCCs (Method 9020), Nickel and Thallium
- ICP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ MSDS _____

• _____ Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

Approval #: 102324.6

Treatment Facility: _____ CMF: ✓

Approved by: (3)

Date: _____

Expiration date: 7/6/00



Midwest Analytical Services, Inc.

"When industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)
: (313) 964-3680
Fax No: (313) 964-2339

Date : 19-Jul-99
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 90712002
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample I.D. : 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

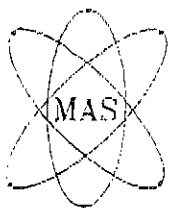
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- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
ppb=parts per billion, µg/l, µg/kg or µg/kg(dry weight)*
- 5. QC information on file.*
- 6. EQL=Estimated Quantitation Limit.*
- 7. N/A=Not Applicable.*

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Charles Hindbaugh
Lab. Quality Manager ext. 115



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2727 Second Avenue

Detroit, Michigan 48201

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(313) 964-3680

Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #: 90712002

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 19-Jul-99

P.O. #: 115-4598

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 09-Jul-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IGNITABILITY	> 200	°F	---	< 140 D001	DD	07/16/99	
SW-846 9045C	*pH / CORROSIVITY	8.78	UNITS	---	<2 : >12.5 D002	NW	07/13/99	
	REACTIVITY:					NW	07/13/99	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003			
40 CFR 261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003			
SW-846 9020EM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	SK	07/13/99	
SW-846 8082	PCB:		mg/kg		---	CBH	07/13/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			MV	07/15/99	
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6010A	SILVER	N/D		1.0	5.0 D011			

* SAMPLE pH MEASURED IN WATER AT 22°C.

Charles Hindbaugh

Charles Hindbaugh
Lab. Quality Manager ext. 115



DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX: (313) 571-7190

Recertification: (Y) N

WASTE APPROVAL FORM

Approval # 102324.6

Code 1390

I GENERAL INFORMATION	
Customer: PARKER AMHEM	Generator: SAME
Address: 32100 STEPHENSON HWY	Address: 32100 STEPHENSON HWY
City: MADISON HEIGHTS	City: MADISON HEIGHTS
State: MI Zip Code: 48071	State: MI Zip Code: 48071
Contact: DELORES LEMBKE	Contact: GEORGE BEYER
Phone #: (810) 553-9300 Fax: (810) 559-4534	Phone #: (810) 553-9300 Fax:
24 hour phone #:	EPA ID#: MID 057 676 124

II WASTE DESCRIPTION
Waste Common Name: Waste Solid Soaps
Specific Process Generating the Waste: Lubricant (Sodium Stearate) used for metal forming

STE COMPOSITION (must equal 100%):	ACTUAL %	MIN.	MAX.
Sodium Stearate		5	10
Water		90	95
Metals (Fe, Zn, Cu, Mg, Li)			0.2

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen	Y (N)	Oxidizer	Y (N)	Organics	Y (N)	Explosives	Y (N)	Phenols	Y (N)	Hexavalent Chromium	Y (N)
Radioactives	Y (N)	Poison	Y (N)	PCBs	Y (N)	Pesticides	Y (N)				

As defined in 40 CFR 268: ☒ Non-wastewater () Wastewater LIQUID SOLID SLURRY

Sample submitted to Dynecol: Y N Color: _____

III RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes _____ No X

If yes, list all waste codes: _____

This is a non-hazardous waste as defined by Michigan Act 136: Yes X No _____

If yes, list all waste codes: 029L

Waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

Yes _____ No X * Unknown _____

If yes, list all waste codes: _____

IV SHIPPING INFORMATION

Waste Volume: 2-6 UNIT: (circle one) GALLONS POUNDS DRUMS OTHER
 Shipping Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

Non-Hazardous

DOT Hazard Class: None

UNNA Number: None

Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

7 18 97

Date

George J. Beyer

Generator Signature

Technical Manager

Title

WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
- PCBs, SHOCs (Method 9020), Nickel and Thallium
- TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes _____ No _____ Complete _____ Partial _____ MSDS _____

Authorization for Dynecol to perform analysis as necessary

Purchase Order # _____

VIII DYNECOL USE ONLY

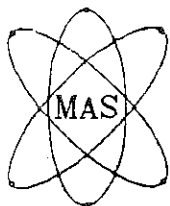
Approval #: 102324.6

Treatment Facility: ② CMF: ✓

Approved by: _____

Date: _____

Expiration date: 6/30/97



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Detroit, Michigan 48201

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Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

Date : 26-Jun-97
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 70618051
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample ID. : 102324.6 WASTE SOLID SOAPS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the sample(s) received. Midwest is not responsible data interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

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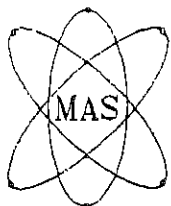
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- 3. Results relate only to the items tested.*
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)
ppb=parts per billion, μ g/l, μ g/kg or μ g/kg(dry weight)*
- 5. QC information on file.*

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Krystyna Czyzo
Lab. Quality Manager



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

IN: KC

TEST REPORT

MAS #: 70618051

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 26-Jun-97

P.O. #: 115-3084

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 102324.6 WASTE SOLID SOAPS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 13-Jun-97

FILE: WASTE\DYNECOL

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT. LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW-846 1010	IGNITABILITY	> 200	°F	---	< 140 D001	CS	06/23/97
SW-846 9045C	*pH / CORROSIVITY	8.37	UNITS	---	<2 : >12.5 D002	CS	06/20/97
	REACTIVITY:					CS	
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003		06/23/97
SW-846 7.3.4.2	REACTIVE SULFIDE	N/D	mg/kg	20	500 D003		06/20/97
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	GEM	06/24/97
SW-846 8080A	PCB:		mg/kg		---	DGP	06/30/97
	AROCLOR 1016	N/D		1.0			
	AROCLOR 1221	N/D		1.0			
	AROCLOR 1232	N/D		1.0			
	AROCLOR 1242	N/D		1.0			
	AROCLOR 1248	N/D		1.0			
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1260	N/D		1.0			
SW-846	TCLP METALS (1311):		mg/l			KRW	06/25/97
6010A	ARSENIC	N/D		1.0	5.0 D004		
6010A	BARIUM	N/D		10	100.0 D005		
6010A	CADMIUM	N/D		0.50	1.0 D006		
6010A	CHROMIUM	N/D		1.0	5.0 D007		
6010A	COPPER	N/D		1.0	100.0 001D (MDNR)		
6010A	LEAD	N/D		1.0	5.0 D008		
7470A	MERCURY	N/D		0.10	0.2 D009		
6010A	NICKEL	N/D		1.0	---		
6010A	SELENIUM	N/D		0.50	1.0 D010		
6010A	SILVER	N/D		1.0	5.0 D011		
6010A	THALLIUM	N/D		5.0	---		
6010A	ZINC	N/D		5.0	500.0 003D (MDNR)		

* SAMPLE pH MEASURED IN WATER AT 24.1°C.

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager

IV SHIPPING INFORMATION

Waste Volume: 50-75 UNIT: (circle one) GALLONS POUNDS DRUMS OTHER
 Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

Non-Hazardous Waste Liquid

DOT Hazard Class:

UN/NA Number:

Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

6, 12, 96
Date

George J. Beyer
Generator Signature

Technical Manager
Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH, and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
- PCBs, SHOCs (Method 9020), Nickel and Thallium
- TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

is _____ No _____ Complete _____ Partial _____ * MSDS _____
 Authorization for Dynecol to perform analysis as necessary
 Purchase Order # _____

II DYNECOL USE ONLY

Proval #: 102417.4

Shipment Facility: _____ CMF: ✓

Approved by: J. O'Mara

Date: _____

Expiration date: 7/31/97

6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX: (313) 571-7190

Certification: Y ☒ N

WASTE APPROVAL FORM

Approval # 102417.6

Code 1390
I GENERAL INFORMATION

Customer: <u>PARKER ARKHEM</u>	Generator: <u>SAME</u>
Address: <u>32100 STEPHENSON HWY</u>	Address: <u>32100 STEPHENSON HWY</u>
City: <u>MADISON HEIGHTS</u>	City: <u>MADISON HEIGHTS</u>
State: <u>MI</u> Zip Code: <u>48071</u>	State: <u>MI</u> Zip Code: <u>48071</u>
Contact: <u>DELORES LEMBKE</u>	Contact: <u>GEORGE BEYER</u>
Phone #: <u>(810) 553-9300</u> Fax: <u>(810) 559-4834</u>	Phone #: <u>(810) 553-9300</u> Fax: <u></u>
24 hour phone #: <u></u>	EPA ID#: <u>MID 057 676 124</u>

II WASTE DESCRIPTION

Waste Common Name: Waste Thermal SS
Specific Process Generating the Waste: best L. for fluid from heat exchangers

WASTE COMPOSITION (must equal 100%):	ACTUAL %	MIN.	MAX.
<u>Thermal</u>	<u>> 98</u>		
<u>Waste</u>	<u>< 2</u>		

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Inorganic Y ☒ N Oxidizer Y N Organics Y ☒ N Explosives Y ☒ N Phenols Y ☒ Hexavalent Chromium Y ☒
Radioactives Y ☒ Poison Y N PCBs Y ☒ Pesticides Y ☒

defined in 40 CFR 268: () Non-wastewater (X) Wastewater LIQUID SOLID SLURRY

Sample submitted to Dynecol: Y N Color:
RCRA/ACT 64 WASTE CHARACTERIZATION

Is it a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes No X

If yes, list all waste codes:

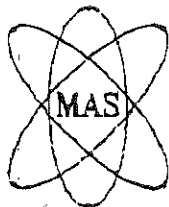
Is it a non-hazardous waste as defined by Michigan Act 136: Yes X No

If yes, list all waste codes: 0291

Does the waste contain a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

No X * Unknown

If yes, list all waste codes:



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2727 Second Avenue
Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01
State of Wisconsin Certification #999941580
State of New Jersey Certification #62733
State of North Dakota Certification #R-085

P: 1-800-801-4MAS (MI, OH, WI, IN, IL)
: (313) 964-3680
F: (313) 964-2339

Date : 25-Jun-96
Client : MOLLY DWINNELLS
DYNECOL, INC.
Mass# : 60613017
PROJECT: : PARKER AMCHEM
Sample LD. : 102417.6 WASTE THERMINOL 55

The above mentioned project has been completed in accordance with the quality control and quality assurance criteria specified by the American Association of Laboratory Accreditation/SW 846/MDNR/WDNR and EPA references from 40 CFR part 136 guidelines.

For your convenience the following legend applies to all the following data sheets:

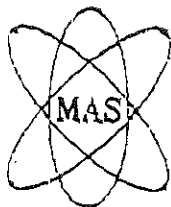
- 1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.*
- 2. N/D=Not detected above Estimated Quantitation Limit, N/A=Not applicable*
- 3. Results relate only to the items tested.*
- 4. mg/l, mg/kg, mg/kg(dry weight) equal ppm(parts per million)
μg/l, μg/kg, μg/kg(dry weight) equal ppb(parts per billion)*

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Krystyna Czyzo
Lab. Quality Manager



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2727 Second Avenue
Detroit, Michigan 48201

A2LA Accredited Certification # 0381-01
State of Wisconsin Certification #999941580
State of New Jersey Certification #62733
State of North Dakota Certification #R-085

P:1-800-801-4MAS (MI, OH, WI, IN, IL)
(313) 964-3680
F: (313) 964-2339

IN: SMR

TEST REPORT

MAS #: 60613017

MOLLY DWINNELLS
DYNECOL, INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 25-Jun-96
P.O. #: 115-2396

PROJECT: PARKER AMCHEM

SAMPLE IDENTIFICATION: 102417.6 WASTE THERMINOL 55 6/12/96

PHYSICAL DESCRIPTION: LIQUID

FILE: WASTE\WCTC

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW-846 1010	IGNITIBILITY	> 200	°F	---	< 140 D001	SS	06/18/96
SW-846 9045C	*pH / CORROSIVITY	8.28	UNITS	---	<2 : >12.5 D002	BB	06/20/96
	REACTIVITY:					BB	06/19/96
SW-846 7.3.3.2	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003		
SW-846 7.3.4.2	REACTIVE SULFIDE	N/D	mg/kg	20	500 D003		
SW-846 8080A	PCB:		mg/kg		---	AAT	06/24/96
	AROCLOR 1016	N/D		1.0			
	AROCLOR 1221	N/D		1.0			
	AROCLOR 1232	N/D		1.0			
	AROCLOR 1242	N/D		1.0			
	AROCLOR 1248	N/D		1.0			
	AROCLOR 1254	N/D		1.0			
	AROCLOR 1260	N/D		1.0			
SW-846	TOILET METALS (1311):		mg/l				
6010A	ARSENIC	N/D		1.0	5.0 D004	KRW	06/20/96
6010A	BARIUM	21		10	100.0 D005	KRW	06/20/96
6010A	CADMIUM	N/D		0.50	1.0 D006	KRW	06/20/96
6010A	CHROMIUM	N/D		1.0	5.0 D007	KRW	06/20/96
6010A	COPPER	N/D		1.0	100.0 001D (MDNR)	KRW	06/20/96
6010A	LEAD	N/D		1.0	5.0 D008	KRW	06/20/96
7470A	MERCURY	N/D		0.10	0.2 D009	DJF	06/19/96
6010A	SELENIUM	N/D		0.50	1.0 D010	KRW	06/20/96
6010A	SILVER	N/D		1.0	5.0 D011	KRW	06/20/96
6010A	ZINC	N/D		5.0	500.0 003D (MDNR)	KRW	06/20/96

*SAMPLE pH MEASURED IN WATER AT 23.6°C.

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager



2955

DYNECOL, INC.

6520 GEORGIA STREET.
DETROIT, MICHIGAN 4821.
PHONE: (313) 571-714.
FAX: (313) 571-719.

Recertification ☒ Y ☐ N

WASTE APPROVAL FORM

Approval # 102417.6Code 1390

I GENERAL INFORMATION

Customer: <u>HENKEL SURFACE TECHNOLOGIES</u>	Generator: <u>SAME</u>
Address: <u>32100 STEPHENSON HWY</u>	Address: <u>32100 STEPHENSON HWY</u>
City: <u>MADISON HEIGHTS</u>	City: <u>MADISON HEIGHTS</u>
State: <u>MI</u> Zip Code: <u>48071</u>	State: <u>MI</u> Zip Code: <u>48071</u>
Contact: <u>DELLRES LEMBKE</u>	Contact: <u>GEORGE BEYER</u>
Phone #: <u>(810) 553-9300</u> Fax: <u>(810) 559-4834</u>	Phone #: <u>(810) 553-9300</u> Fax: <u></u>
24 hour phone #: <u></u>	EPA ID#: <u>MID C57 676 124</u>

II WASTE DESCRIPTION

Waste Common Name: WASTE THERMINOL SS

Specific Process Generating the Waste: THERMINOL FROM HEAT EXCHANGER

ASTE COMPOSITION (must equal 100%):

ACTUAL %

MIN.

MAX.

<u>THERMINOL</u>	<u>100</u>		

CIRCLE YES (Y) OR NO (N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen Y ☒ N ☐ Oxidizer Y ☒ N ☐ Organics Y ☒ N ☐ Explosives Y ☒ N ☐ Phenols Y ☒ N ☐ Hexavalent Chromium Y ☒ N ☐

Radioactives Y ☒ N ☐ Poison Y ☒ N ☐ PCBs Y ☒ N ☐ Pesticides Y ☒ N ☐

As defined in 40 CFR 268: (☒) Non-wastewater () Wastewater LIQUID SOLID SLURRYSample submitted to Dynecol: ☒ Y ☐ N Color: BROWN

III RCRA/ACT 64 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 64 or EPA 40 CFR 261: Yes _____ No X

If yes, list all waste codes:

This is a non-hazardous waste as defined by Michigan Act 136: Yes X No _____

If yes, list all waste codes:

021 L

This waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043:

Yes _____ No X _____ Unknown _____

If yes, list all waste codes:

* If based on generator knowledge, please read and understand certification in Section VI

Revised April

IV SHIPPING INFORMATION

Waste Volume: S-10 UNITS: (circle one) GALLONS POUNDS DRUMS OTHER

Shipment Frequency: (circle one) WEEK MONTH QUARTER YEAR ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

Non-Hazardous Liquid

DOT Hazard Class: UNNA Number: Packing Group: I II III None

V COMMENTS

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

GEORGE J. BEYER

Generator Name (Please print or type)

9 / 9 / 97

Date

Generator Signature

Title

II WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH, and Reactives (Detection limit of 10ppm for Cyanide and Sulfide)
 - PCB, SHOC, Method 9020, Nickel and Thallium
 - TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
 - Michigan metals: Copper and Zinc
- (The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes No Complete Partial MSDS

Authorization for Dynecol to perform analysis as necessary

Purchase Order #

VIII DYNECOL USE ONLY

Approval #: 102417.6

Treatment Facility: CMF:

Approved by:

Date:

Expiration date: 9/30/98



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Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)
(313) 964-3680
Fax No. (313) 964-2339

Date : 19-Sep-97
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 70910017
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample I.D. : 102417.6 WASTE THERMINOL 55

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

For your convenience the following legend applies to all the following data sheets.

- 1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.*
- 2. N/D=Not detected.*
- 3. Results relate only to the items tested.*
- 4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)*
ppb=parts per billion, $\mu\text{g/l}$, $\mu\text{g/kg}$ or $\mu\text{g/kg(dry weight)}$
- 5. JC information on file.*

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You.

Sincerely,

Krystyna Czyzo
Lab. Quality Manager



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)
(313) 964-3680
Fax No: (313) 964-2339

IN: NWB

TEST REPORT

MAS #: 70910017

MOLLY DWINNELLS
DYNECOL INC.
6520 GEORGIA
DETROIT, MI 48211

DATE COMPLETED: 19-Sep-97
P.O. #: 115-3269

PROJECT: HENKEL SURFACE TECHNOLOGIES
SAMPLE IDENTIFICATION: 102417.6 WASTE THERMINOL 55
PHYSICAL DESCRIPTION: LIQUID
Sample Date: 09-Sep-97

FILE: WASTE/DYNECOL

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	ESTIMATED QUANT. LIMIT	REGULATORY LIMIT	ANALYST	DATE ANAL.
SW-846 1010	IGNITIBILITY	> 200	°F	---	140 200	EDH	10/18/97
SW-846 9045C	PH & CORROSIVITY	3.58	UNITS	---	ND > 100.0 2000	DE	10/19/97
	REACTIVITY:						
SW-846 7.3.3.2	REACTIVE OXIDE	N/D	mg/kg	50	150 2000		10/19/97
SW-846 7.3.4.2	REACTIVE SULFIDE	N/D	mg/kg	10	500 2000		
SW-846 9020EM	TOTAL REACTIVE HALOGENS		mg/kg	---	---		
SW-846 8080A	PCB:		mg/kg	---	---	DE	
	AROCLOL 1016	N/D		1.0			
	AROCLOL 1021	N/D		1.0			
	AROCLOL 1033	N/D		1.0			
	AROCLOL 1242	N/D		1.0			
	AROCLOL 1248	N/D		1.0			
	AROCLOL 1254	N/D		1.0			
	AROCLOL 1260	N/D		1.0			
SW-846	TCLP METALS (1311):		mg/L			EDH	
6010A	ARSENIC	N/D		1.0	5.0 3004		
6010A	BARIUM	N/D		10	100.0 3005		
6010A	CADMIUM	N/D		0.50	1.0 3006		
6010A	CHROMIUM	N/D		1.0	5.0 3007		
6010A	COPPER	1.1		1.0	100.0 3015 (MDNR)		
6010A	LEAD	4.7		1.0	5.0 3008		
7470A	MERCURY	N/D		0.10	0.2 3009		
6010A	NICKEL	N/D		1.0	---		
6010A	SELENIUM	N/D		0.30	1.0 3010		
6010A	SILVER	N/D		1.0	5.0 3011		
6010A	THALIUM	N/D		5.0	---		
6010A	ZINC	9.0		5.0	500.0 303D (MDNR)		

* SAMPLE PH MEASURED IN WATER AT 19.2°C.

Krystyna Czyzo

Krystyna Czyzo
Lab. Quality Manager



FINDING NUMBERS TWO (2), THREE (3), & SEVEN (7)

- WEEKLY INSPECTIONS (SAMPLES)
- MONTHLY HOUSEKEEPING INSPECTIONS (SAMPLES)
- UPDATED HAZARDOUS WASTE PROGRAM
- PICTURES:
 - PROPERLY MARKED UP LABEL
 - SATELLITE ACCUMULATION AREA
 - HAZARDOUS WASTE STORAGE AREA





HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION

NAME HAARER, S. J. & SONS, INC.

ADDRESS 1000 N. 10th St. PHONE 214-355-7100

CITY Fort Worth, Texas STATE TX ZIP 76102

EPA / MANIFEST
ID NO. / DOCUMENT NO.

ACQUITTANCE
START DATE EPA
WASTE NO. 0001

Corrosive liquid waste

DO NOT PROCEED SHIPPING NAME AND EPA ID NO. UNTIL PROVED

HANDLE WITH CARE!

FINDING NUMBER FOUR (4)

- HAZARDOUS WASTE RESPONSIBILITIES
- ACCOMPANYING INTERNAL MEMO

MEMO

Date: January 17, 2000
To: M. Schubert
cc: J. Garavanta, B. Keck, G. Kohlsmith, T. Snell
From: R. Budnik
Subject: U.S. EPA Mandated Updates to Job Descriptions for Waste Handling

Mike,

One of the issues pointed out by the U. S. EPA and the Michigan DEQ during their inspection of the Madison Heights facility for Hazardous Waste Compliance in September, 1999 was that our job descriptions did not adequately reflect or identify the waste handling duties of various personnel in this building who handle hazardous wastes.

As a resolution to this I have generated a list of hazardous waste responsibilities broken down into two categories which reflect the different levels of involvement that various personnel have with our hazardous waste management program here in Madison Heights. I have also summarized the various generic job titles into two lists under either Category I or Category II.

I have attached the document with the lists and waste responsibilities to this memo. The last step in complying with the U. S. EPA's request to update our job descriptions would be to attach my documents to all job descriptions in HR for the personnel titles in the category lists. Another option would be to insert the appropriate waste handling responsibilities into the job descriptions based on the categories.

If you have any questions or concerns with this matter please do not hesitate to contact me.

Thanks,

Bob

MADISON HEIGHTS HAZARDOUS WASTE RESPONSIBILITIES BY JOB TITLE

Category I

- Identify and Characterize Hazardous Waste
 - Characteristic Wastes
 - Listed Wastes
 - Waste Determination
- Large Quantity Generator Requirements
 - Accumulation Period
 - Container Management
 - Storage & Inspections
 - Adsorbents & Stabilization
 - Labeling, Manifests, LDRs
 - Loading of Wastes
 - Emergency Preparedness
 - Emergency Procedures & Training
 - Satellite Storage and Accumulation
- Release Reporting & Biennial Reports
- Management of Miscellaneous Wastes
 - Fluorescent Light Bulbs
 - Batteries
 - Used Oils

Category II

- Identify and Characterize Hazardous Waste
 - Characteristic Wastes
 - Listed Wastes
 - Waste Determination
- Large Quantity Generator Requirements
 - Accumulation Period
 - Container Management
 - Labeling Requirements
 - Storage & Inspections
 - Emergency Procedures & Training
 - Satellite Storage and Accumulation

Category I

Maintenance Personnel
Shipping & Receiving
Custodial Service Group Leader
Regulatory Affairs Manager
HS&E Specialist
H&S Specialist
Director RAPA

Category II

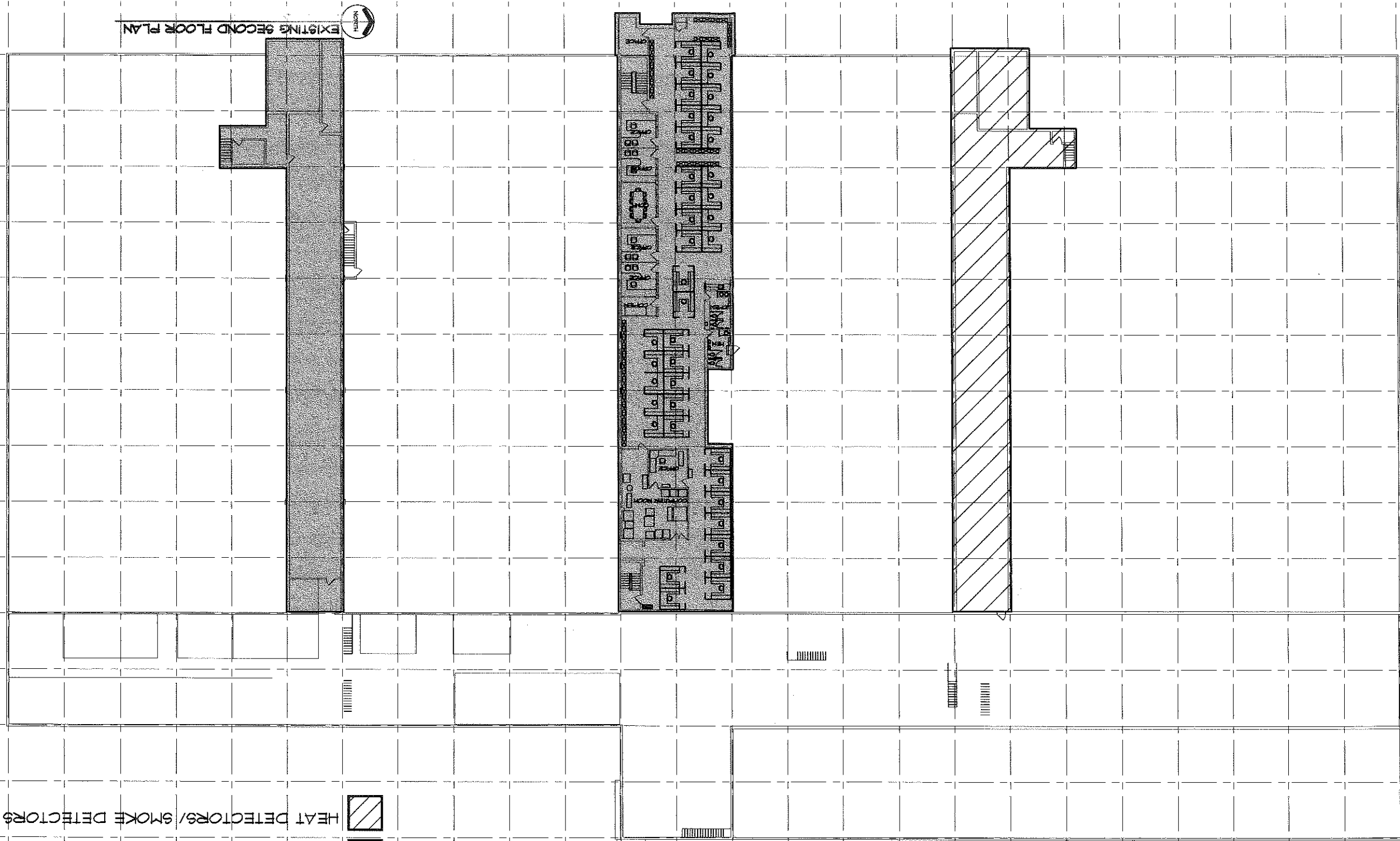
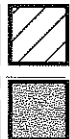
Technical Service Reps
Technicians
Chemists
Scientists
Laboratory Manager
Technical Managers
Technical Director
Application Painter





FINDING NUMBER FIVE (5)

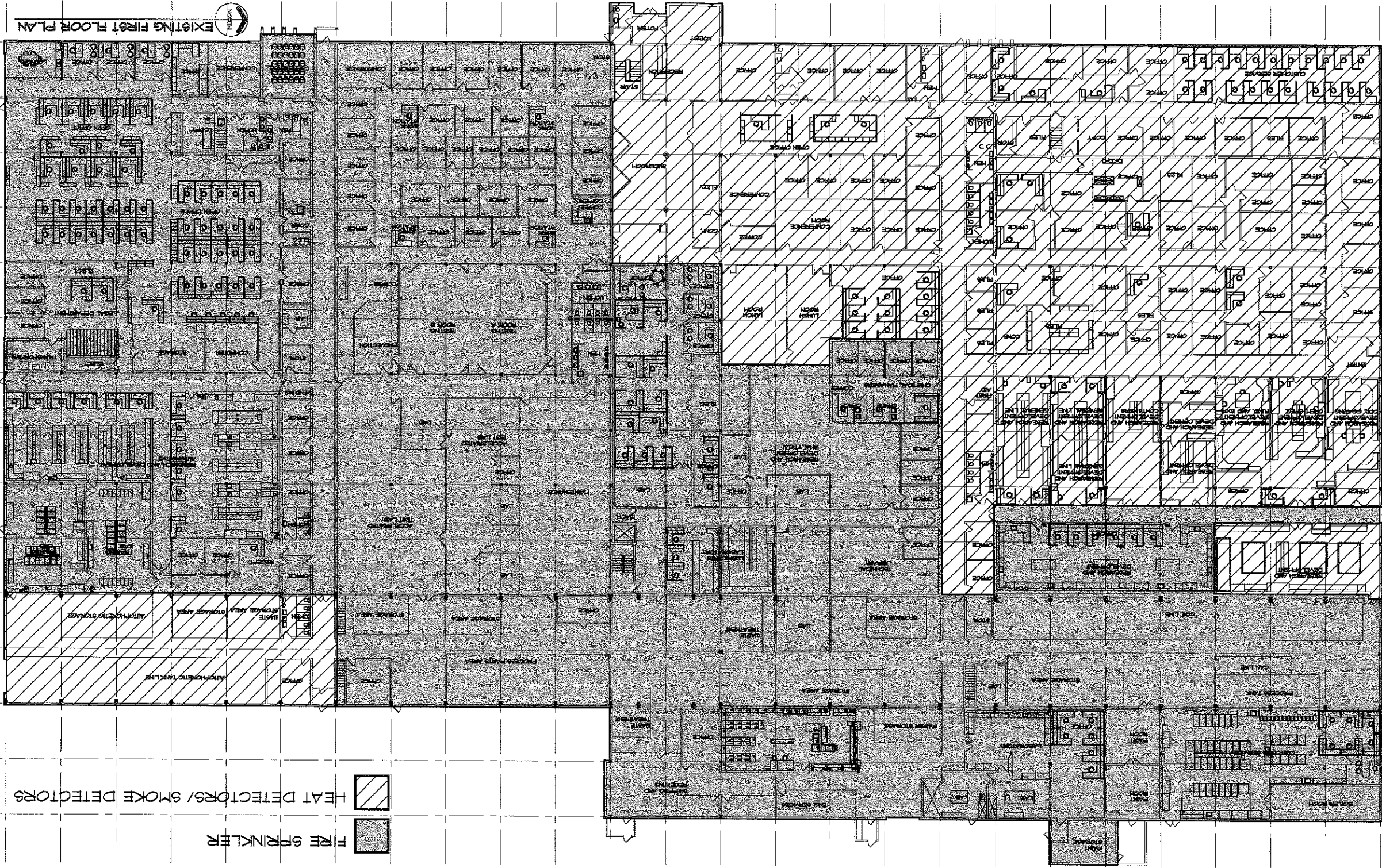
- BUILDING LAYOUT

FIRE SPRINKLER
HEAT DETECTORS/ SMOKE DETECTORS



EXISTING SECOND FLOOR PLAN

 FIRE SPRINKLER
 HEAT DETECTORS/ SMOKE DETECTORS



EXISTING FIRST FLOOR PLAN

FACILITY CHEMICAL STORAGE AND LAB AREA LAYOUT

See Figure 1, page 11..

INVENTORY OF MATERIALS STORED IN THE FACILITY

An inventory of materials is available by Henkel Surface Technologies at all times. (see Appendix B). The listing includes the incoming products and finished products at the facility at any time.

LOCATION OF MATERIAL SAFETY DATA SHEETS

Material Safety Data Sheets for chemicals are located as follows:

Raw materials and Finished goods - in the RAPA office area.

NOTIFICATION PROCEDURES

In the event of a fire, explosion, or release of oil or chemicals associated with the storage and production areas, notification procedures are as follows:

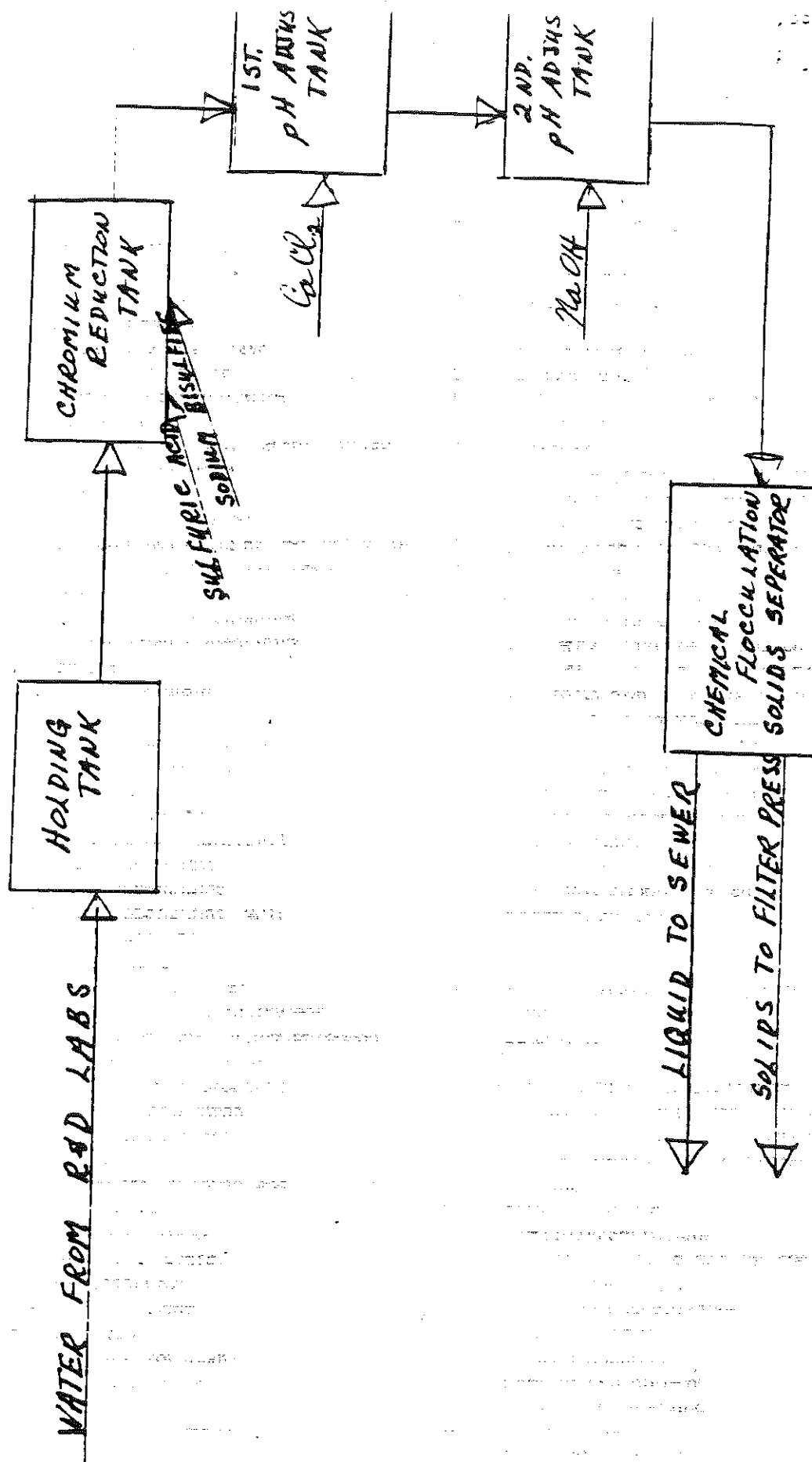
- Any employee(s) encountering an emergency situation will immediately alert key onsite personnel.
- If key personnel are not onsite, the switchboard operator (day shift) will be immediately notified and will alert key personnel.
- The operator (or designated supervisor during second shift) will call the appropriate personnel and notify them of any emergency event associated with the chemical storage area.

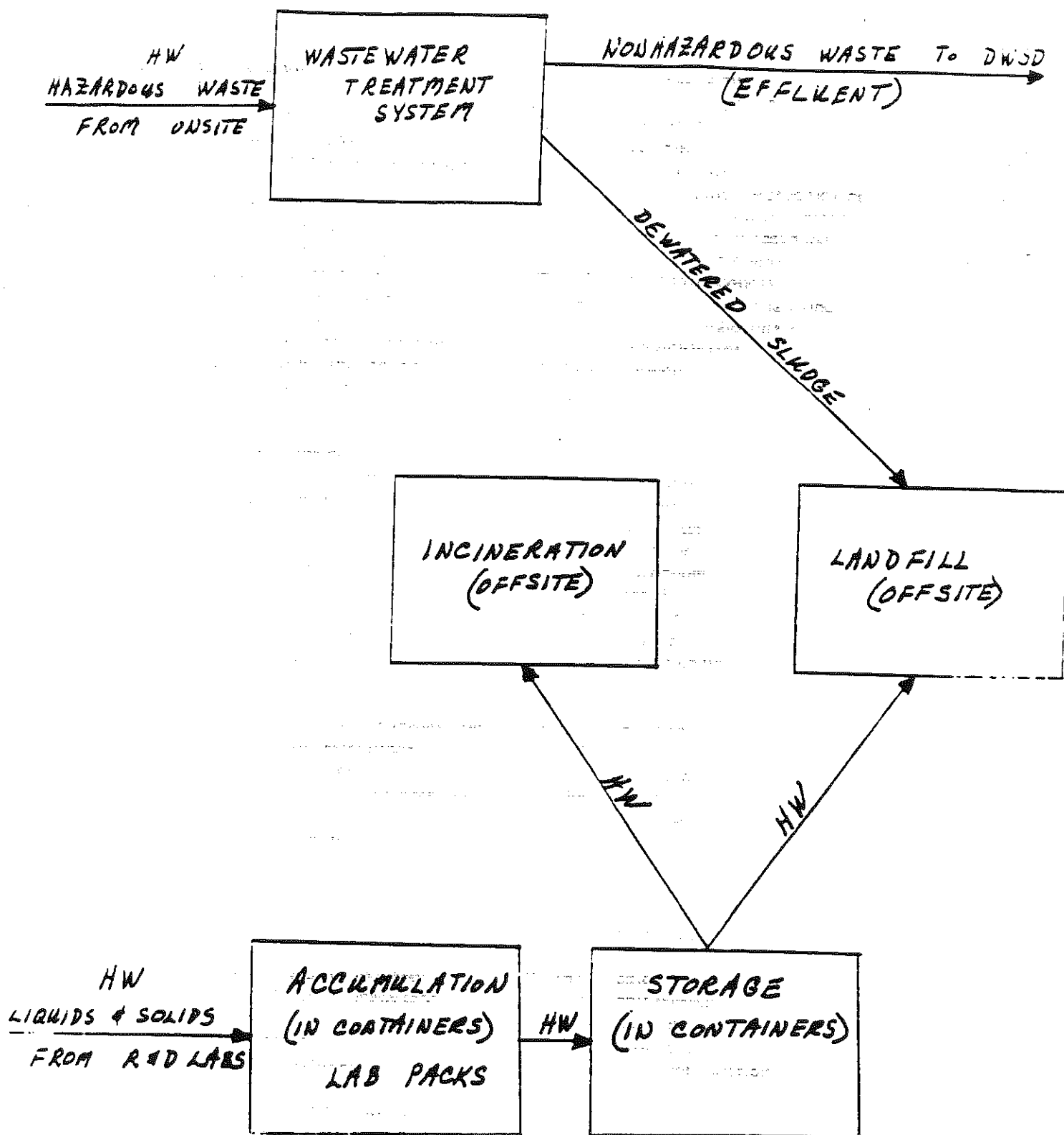
If the emergency event occurs during nights, evenings, weekends, or holidays when no facility personnel are present, the following occurs:

- In the event of a break-in, the security company notifies the police and key plant personnel.
- In the event of a fire, the sprinklers are set off, the security company then notifies the fire department and key plant personnel.

In the event of a spill in the bulk storage area, an alarm will alert the security company.

WASTEWATER TREATMENT SYSTEM





REPORT OF OIL, SALT OR POLLUTING MATERIAL LOSSES

Pursuant to the provisions of Act 245 of the Public Acts of Michigan 1929 as amended, regulations have been issued which require that all owners, managers or operators of vessels, oil storage or on land facilities shall notify the Water Resources Commission or his authorized representative of oil, salt and polluting material losses. This notification shall be made promptly by telephone or telegraph, giving briefly the particulars, and by mail, giving a detailed account of events and conditions.

Date		Company Name	
Location of Loss (See Remarks)			
Nature of Loss		Amount	Name of Surface Water Impacted
Date Loss was Discovered		Type of Discharge	
Name of Department or Agency Responsible for Investigation			
Telephone or Telegraphed by Whom			Time
Cause of Loss (Include Type of Equipment and Other Details)			
Nature of Loss (Include Complete Description of Damage)			
Additional Comments (Include Method of Control, Plans for Prevention or Remediation, etc.)			
Company Name		By Signature	

Return this form to: Remedial Action Section
Ground Water Quality Division
Michigan Department of Natural Resources

Box 30028
Lansing, Mich. 48908
24 hr. Emergency Notification Number
517/373-7600

Key

▷ = chemical available on site.

E.P.A. PRIORITY POLLUTANTS and MICHIGAN CRITICAL MATERIALS LIST

ORGANICS

- | | |
|--------------------------------|--------------------------------|
| ▷ 1. acids | 19. o-anisidine hydrochloride |
| 2. acenaphthene | 20. benz(a)anthracene |
| 3. acetone cyanohydrin | ▷ 21. benzene |
| 4. 2-acetylaminofluorene | 22. benzidine |
| 5. acrolein | 23. benzidine salts |
| 6. acrylic acid | 24. benzo(a)pyrene |
| 7. acrylonitrile | 25. brucine |
| 8. allyl chloride | ▷ 26. carbon tetrachloride |
| 9. 2-aminoanthraquinone | 27. chlorinated benzenes |
| 10. aminozobenzene | 27. a. chlorobenzene |
| 11. o-aminotoluene | 27. b. 1,2,4-trichlorobenzene |
| 12. 4-aminobiphenyl | 27. c. 1,2-dichlorobenzene |
| 13. 3-amino-9-ethylcarbazole | 27. d. 1,3-dichlorobenzene |
| 14. 1-amino-2-methylanthraquin | 27. e. 1,4-dichlorobenzene |
| 15. aminotriazole (amitrole) | 28. chlorinated dibenzofurans |
| ▷ 16. aniline | 29. chlorinated dioxins |
| 17. aniline hydrochloride | 30. chlorinated ethanes |
| 18. o-anisidine | ▷ 30. a. 1,1,1-trichloroethane |
| | 30. b. 1,1-dichloroethane |
| | 30. c. chloroethane |

PESTICIDES

173.	aldicarb	221.	heptachlor epoxide
174.	aldrin	222.	isomers of hexachlorocyclohexane
175.	4-aminopyridine	222.	a. α -HHC-Alpha
176.	anilazine	222.	b. β -HHC-Beta
177.	antimycin A	222.	c. γ -HHC-Delta
178.	azinphos-ethyl	223.	leptophos
179.	azinphos-methyl	224.	malathion
180.	barban	225.	metabolites of DDT
181.	bemidocarb	225.	a. 4,4'-(DDT);(p,p'-DDT)
182.	benzoyl	225.	b. 4,4'-(DDT);(p,p'-DDT)
183.	bromoxynil	226.	metabolites of endosulfan
184.	2(p-tert-butylphenoxy)-isopropyl 2-chloroethyl sulfite	226.	a. endosulfan sulfate
185.	captan	227.	metabolites of endrin
186.	captan	227.	a. endrin aldehyde
187.	carbaryl	228.	metabolites of heptachlor
188.	carboxfuran	228.	a. heptachlor epoxide
189.	carboxphenanthrene	229.	methomyl
190.	chlorodane	230.	methoxychlor
191.	chlordecene	231.	methyl mercaptan
192.	chlorfenvinphos	232.	methyl parathion
193.	chlorobenzilate	233.	mevinphos
194.	chlorpyrifos	234.	mexacarbate
195.	chlortriazol	235.	mirex
196.	coumaphos	236.	monocrotophos
197.	cycloxyphos	237.	naled
198.	cycloheximide	238.	nicotine
199.	DDT	239.	nitrofen
200.	demeton	240.	oxydemeton-methyl
201.	diallate	241.	paraquat
202.	diazinon	242.	parathion
203.	dibromochloropropane (DBCP)	243.	phorate
204.	dichloro	244.	phosacetim
205.	dichlorvos	245.	phosmet
206.	dichrotophos	246.	phosphamidon
207.	dieldrin	247.	rotenone
208.	dimethoate	248.	silvex, propylene glycolhexyl ether ester
209.	dimocap	249.	sodium fluoroacetate
210.	dimoseb	250.	strychnine
211.	disulfathion	251.	sulfallate
212.	disulfoton	252.	sulfotep
213.	endosulfan	253.	ITE
214.	endrin	254.	LEPP
215.	EPN	255.	terbufos
216.	ethan	256.	tetrachlorvinphos
217.	fensulfothion	257.	thiram
218.	fenthion	258.	toxaphene
219.	fluchloralin	259.	trichlorfon
220.	heptachlor	260.	trichlorophenoxyacetic acid (2,4,5-T)
		261.	trifluralin
		262.	ziram

30. d. 1,1,2,2-tetrachloroethane
31. chlorinated naphthalene
31. a. 2-chloronaphthalene
32. chlorinated phenols
32. a. 2-chlorophenol
32. b. parachlorometa-cresol
32. c. 2,4-dichlorophenol
33. 1-chloro-2,3-epoxypropane
34. chloroalkyl ethers
34. a. 2-chloroethyl vinyl ether (mixed)
35. bis(2-chloroethyl)ether
- ▷ 36. Chloroform
37. bis(2-chloromethyl)ether
38. 3-(chloromethyl)pyridine hydrochloride
39. 1-(4-chlorophenyl)-3,3-dimethyl triazene
40. 4-chloro-m-phenylenediamine
41. 4-chloro-o-phenylenediamine
42. chloroprene
43. 5-chloro-o-toluidine
44. p-cresidine
45. 2,4-diaminoanisole sulfate
46. 4,4-diaminodiphenyl ether
47. 2,4-diaminotoluene
48. dibenz(a,h)anthracene
49. tris(dibromopropyl)phosphate
50. di-n-butyl phthalate
51. 3,3-dichlorobenzidine
52. 3,3-dichlorobenzidine salts
53. 1,2-dichloroethane
54. dichloroethylenes
54. a. 1,1-dichloroethylene
54. b. 1,2-trans-dichloroethylene
55. dichloropropane and dichloropropene
55. a. 1,3-dichloropropylene; (1,3-dichloropropene)
55. b. 1,2-dichloropropane
56. 1,2:3,4-diepoxybutane
57. diethyl sulfate
58. 4-dimethylaminoazobenzene
59. dimethylhydrazines
60. 2,4-dimethyl phenol
61. 4,6-dinitro-o-cresol
62. 2,4-dinitrophenol
63. 2,4-dinitrotoluene
64. dinitrotoluene
64. a. 2,6-dinitrotoluene
65. di-n-octyl phthalate
66. 1,4-dioxane
67. 2,3-epoxy-1-propanol
68. ethylbenzene
69. ethylene dibromide
70. ethyleneimine
71. ethylene oxide
72. ethylene thiourea
73. bis(2-ethylhexyl)phthalate
74. ethylmerhanesulfonate
75. fluoroanthene
76. 2-(2-formylhydrazino)-4-(5-nitro-2-furyl)thiazole
77. Haloethers
77. a. 4-chlorophenyl phenyl ether
77. b. 4-bromophenyl phenyl ether
77. c. bis(2-chloroisopropyl) ether
77. d. bis(2-chloroethoxyl)methane
78. Halomethanes
- ▷ 78. a. methylene chloride; (dichloromethane)
78. b. methyl chloride; (chloromethane)
78. c. methyl bromide; (bromomethane)
78. d. bromoform; (tribromomethane)
78. e. dichlorobromomethane
78. f. trichlorofluoromethane
78. g. dichlorodifluoromethane
78. h. chlorodibromomethane
79. hexachlorobenzene (HCB)
80. hexachlorobutadiene
81. hexachlorocyclohexane
82. hexachlorocyclopentadiene
83. hexachloroethane
84. hydrazobenzene
85. hydroquinone
86. N-(2-hydroxyethyl)ethyleneimine
87. isophorone
88. lactonitrite
89. malachite green
90. methylenebis(2-chloroaniline)
91. 4,4-methylenebis(2-methylaniline)
92. 4,4-methylenbis(N,N-dimethylaniline)
93. 1,2(methylenedioxy)-4-propenyl benzene
94. methyl hydrazine
95. 1-methylanththalene
96. 2-methyl-1-nitroanthraquinone
97. mustard gas
98. 1,5-naphthalenediamine
- ▷ 99. 1-naphthylamine
100. 2-naphthylamine
101. 5-nitroacenaphthene
102. 5-nitro-o-anisidine
- ▷ 103. nitrobenzene
104. 4-nitrobiphenyl

- 105. nitrogen mustard
- 106. 2-nitrophenol
- 107. 4-nitrophenol
- 108. Nitrosamines
- 108. a. N-nitrosodiphenylamine
- 108. b. N-nitrosodi-n-propylamine
- 109. N-nitroso-n-butyl-N-(4-hydroxybutyl) amine
- 110. N-nitrosodiethylamine
- 111. N-nitrosodimethylamine
- 112. p-nitrosodiphenylamine
- 113. N-nitroso-N-ethylurea
- 114. N-nitroso-N-methylurea
- 115. N-nitroso-N-methylurethane
- 116. N-nitrosomethylvinylamine
- 117. N-nitrosomorpholine
- 118. N-nitroso-N-phenylhydroxyl-amine, ammonium salt
- 119. N-nitrososarcosine
- 120. pentachloronitrobenzene
- 121. pentachlorophenol
- 122. peroxyacetic acid
- ▷ 123. phenol
- 124. Phthalate esters
- 124. a. butyl benzyl phthalate
- 124. b. diethyl phthalate
- 124. c. dimethyl phthalate
- 125. piperonyl sulfoxide
- 126. polybrominated biphenyls (PBB)
- 127. polychlorinated biphenyls (PCH)
- 128. Polynuclear aromatic hydrocarbons
- 128. a. 3,4-benzofluoranthene
- 128. b. benzo(k) fluoranthene; (11,12-benzofluoranthene)
- 128. c. chrysene
- 128. d. acenaphthylene
- 128. e. anthracene
- 128. f. benzo(ghi)perylene; (1,12-benzoperylene)
- 128. g. fluorene
- 128. h. phenanthrene
- 128. i. indeno(1,2,3-cd)pyrene; (2,3-0-phenylene-pyrene)
- 128. j. pyrene
- 128. k. naphthalene
- 129. 1,3-propane sultone
- 130. R-probolactone
- 131. 5-propyl-1,3-benzodioxole
- 132. propyleneimine
- 133. semicarbazide
- 134. styrene

- 135. tetrachloroethylene (perchloroethylene)
- 136. thioacetamide
- 137. 4,4'-thiodianiline
- ▷ 138. thiourea
- ▷ 139. toluene
- ▷ 140. o-toluidine
- 141. o-toluidine hydrochloride
- 142. triaryl phosphate esters
- 143. 1,1,2-trichloroethane
- 144. trichloroethylene
- ▷ 145. trichlorophenols
- 146. 2,4,5-trimethylaniline
- 147. trimethylphosphate
- 148. vinylchloride
- ▷ 149. xylene

A. INORGANICS

- ▷ 150. antimony
- ▷ 151. arsenic
- 152. beryllium
- 153. cadmium
- ▷ 154. chromium
- ▷ 155. cobalt
- ▷ 156. copper
- ▷ 157. cyanides
- 158. hypochlorite
- 159. lead
- 160. lithium
- ▷ 161. mercury
- ▷ 162. nickel
- 163. selenium
- ▷ 164. silver
- 165. thallium
- ▷ 166. zinc

B. INORGANICS

- ▷ 167. acids
- 168. chloramines
- 169. chlorine
- 170. hydrazine
- 171. hydrogen sulfide

C. INORGANICS

- 172. asbestos (fibrous)

Appendix B

Fire Extinguishers

Three types are available. See attached floor plan for location.

Location

Emergency Oxygen

1. First Aid Room (D-73)
2. Maintenance Office
3. Second Floor, Xerox Room
4. New Lab Area, West Hall

Fire Hydrants

1. Front of Facility (West side) at main lobby entrance.
2. Southwest of Facility, across side street (Whitcomb).
3. Northwest of Facility, near parking lot.

Spill Control Equipment

1. Neutralization - Soda Ash (TD 1500 - 0)

Quantity

100 lb.

Location

Applications Lab.

2. Oil Absorbent

Quantity

75 lbs., Spill Tamer
1 case Sorbent Pillows
1 case Sorbent Pads
200 lbs. Zorb-All

Location

Technical Stockroom
Maintenance Stockroom
Maintenance Stockroom
Maintenance Area

3. Containers

Quantity

Steel, open head
Steel, closed head
with poly liner

Size

55 gal.
55 gal.

Location

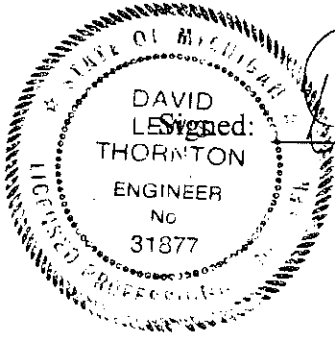
Shop Area or Stockroom
Shop Area or Stockroom

Communications

Alarm: Main lobby, switchboard activated.
Phones: All laboratory and office areas.
ADT: Fire pull boxes - throughout building in halls.

Statement of Approval by Registered Professional Engineer:

"I have examined this facility and am familiar with the provisions of Title 40, Code of Federal Regulations 112, and attest that the Spill Prevention Control and Countermeasure Plan for this facility has been prepared in accordance with good engineering practice."



Signed: David L. Thornton PE
David L. Thornton, P.E.

Date: 3/18/99

Michigan Registration Number: 31877

Facility Manager: Thomas M. Snell
Thomas M. Snell

Date: 3/18/99

Date of Next Mandatory Review: 3/18/02
(Every three years)

FINDING NUMBER NINE (9)

- COPY OF RECYCLING PROGRAM DOCUMENTATION
- ANALYTICAL DATA FOR THE PAINT FILTERS



THE ENVIRONMENTAL QUALITY COMPANY

36255 MICHIGAN AVENUE • WAYNE, MICHIGAN 48184 • tel 734 329-8000 • fax 734 329-8140 • www.eqonline.com

* **Recycling:** Following are several different pricing options for the recycling of universal wastes. EQ can provide personnel to sort and package materials as requested by Henkel. Pricing is outlined for lamps, batteries, office paper, cardboard and scrap steel. EQ can also provide recycling for computer monitors, mercury electrical equipment and PCB ballast/materials if required. Pricing is provided for common types of lamps and batteries although we can manage many types of materials and further pricing can be provided upon request. Transportation pricing for the lamps and batteries is noted above via tractor-trailer or barrel truck.

* *Recycling of Lamps*

Fluorescent 4' and compacts	\$0.32/lamp
Fluorescent 5' and greater	\$0.50/lamp
Fluorescent Tube Option	\$0.09/foot

* *Batteries*

Alkaline AAA through D	\$0.89/pound
Nickel Cadmium	\$1.12/pound
Lead Acid (Dry)	\$0.55/pound

Office Paper & Cardboard:

Option A: EQ will provide one 8-yard box to be placed on site for the collection of office paper and cardboard. The box will be emptied once per week or as requested by Henkel. Pricing includes the recycling box, transportation, pick-up fees and rental. EQ will credit Henkel's account for the recycled paper. This amount may vary based upon quantity, type of paper and the market value of recyclable materials.

Eight-Yard Box	\$120.00/month/box
----------------	--------------------

Option B:

EQ will provide 90-gallon recycling bins to be placed throughout specified office areas. The bins will be emptied as requested by Henkel. Pricing includes the recycling bins, transportation, pick-up fees and rental. EQ will credit Henkel's account for the recycled paper. This amount may vary based upon quantity, type of paper and the market value of recyclable materials.

Recycling Bins	\$65.00/month
----------------	---------------

Scrap Steel: A 10-12 Yard Box will be placed on site for the collection of scrap metal. The box will be switched out once per month or as frequently as requested. The monthly pricing includes rental and transportation. EQ will credit your account for the recycling of the scrap metal. The credited amount may vary as the market fluctuates within the scrap metal industry.

Monthly Fee	\$125.00/month/box
-------------	--------------------



THE ENVIRONMENTAL QUALITY COMPANY

36255 MICHIGAN AVENUE WAYNE, MICHIGAN 48184 • tel 734 329-8000 • fax 734 329-8140 • www.eqonline.com

Emergency Response: EQ can provide 24 hour emergency response at your Madison Heights Facility. EQ's emergency response team has the ability to handle your emergency spill from start to finish. A detailed brochure is attached for your information.

Industrial Cleaning: EQ Industrial Services can provide virtually all of your industrial cleaning needs. Pricing can be quoted upon your request.

Training: EQ can provide on-site training for Henkel personnel. We provide OSHA refresher courses along with RCRA 2-hour refresher courses. Pricing can be quoted upon request.

Materials: EQ can provide all necessary materials to handle your waste management needs.

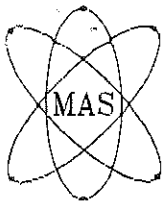
55-Gallon Steel Drums	\$35.00/drum
Open or closed top	
One Yard Boxes	\$85.00/box
Boxes for Lamp Shipment	\$6.60/box
(4' or 8')	

Labpacks: Labpacks will be scheduled once every six weeks or as requested by Henkel. See Attachment A for pricing.

If you have any questions regarding the above scope of work, feel free to give me a call at anytime. Once again, thank you for choosing EQ and related companies for your environmental management solutions.

Sincerely,

Jennifer LaPeer Chopp
Resource Manager
734-547-1005



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology
2727 Second Avenue
Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

Date : 28-Dec-99
Client : MOLLY DWINNELLS
: DYNECOL, INC.
Mas# : 91222018
PROJECT: : HENKEL SURFACE TECHNOLOGIES
Sample I.D. : 107385.6 PAINT BOOTH FILTERS

The above mentioned project has been completed in accordance with the Quality Assurance Project Plan written by Midwest Analytical Services, Inc., using SW-846, DEQ, EPA, Standard Methods and ASTM documents as reference guidelines. Specific sample information is available upon request (i.e. hold times etc.). This test report applies only to the samples received. Midwest is not responsible for interpretation of this test report. Please read the following numbered comments carefully. Thank you for choosing Midwest Analytical Services, Inc.

For your convenience the following legend applies to all the following data sheets.

1. Reports shall not be reproduced, except in full, without written approval of Midwest Analytical Services, Inc.

2. N/D=Not detected.

3. Results relate only to the items tested.

4. ppm=parts per million, mg/l, mg/kg or mg/kg(dry weight)

ppb=parts per billion, $\mu\text{g/l}$, $\mu\text{g/kg}$ or $\mu\text{g/kg(dry weight)}$

5. QC information on file.

6. EQL=Estimated Quantitation Limit.

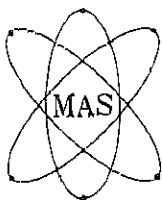
7. N/A=Not Applicable.

If you have any questions regarding this project please feel free to contact me at 1-800-801-4MAS or 1-313-964-3680.

Thanking You,

Sincerely,

Norman Brooks
Customer Service Quality Manager ext. 130



Midwest Analytical Services, Inc.

"Where industry comes for answers"

Metropolitan Center for High Technology

2727 Second Avenue

Detroit, Michigan 48201

All test reports include a cover sheet.

Phone: 1-800-801-4MAS (MI only)

: (313) 964-3680

Fax No: (313) 964-2339

IN: CDH

TEST REPORT

MAS #: 91222018

MOLLY DWINNELLS

DYNECOL, INC.

6520 GEORGIA

DETROIT, MI 48211

DATE COMPLETED: 28-Dec-99

P.O. #: 115-4947

PROJECT: HENKEL SURFACE TECHNOLOGIES

SAMPLE IDENTIFICATION: 107385.6 PAINT BOOTH FILTERS

PHYSICAL DESCRIPTION: SOLID

Sample Date: 22-Dec-99

METHOD #	PARAMETER	SAMPLE RESULT	UNITS	EQL	REGULATORY LIMIT	ANALYST	DATE ANALYZED	DATA FLAG
SW-846 1010	IONIZABILITY	> 200	°F	---	< 140 D001	BA	12/23/99	
SW-846 9045C	*pH / CORROSIVITY	6.78	UNITS	---	< 2 : > 12.5 D002	NW	12/23/99	
SW-846 7.3.3.2	REACTIVITY:							
40 CPM	REACTIVE CYANIDE	N/D	mg/kg	50	250 D003	NW	12/27/99	
261.23.5	REACTIVE SULFIDE	NEGATIVE	---	--	D003	NW	12/27/99	
SW-846 9020BM	TOTAL ORGANIC HALOGENS	N/D	mg/kg	100	---	HL	12/27/99	
SW-846 8082	PCB:		mg/kg		---	DGB	12/24/99	
	AROCLOR 1016	N/D		1.0				
	AROCLOR 1221	N/D		1.0				
	AROCLOR 1232	N/D		1.0				
	AROCLOR 1242	N/D		1.0				
	AROCLOR 1248	N/D		1.0				
	AROCLOR 1254	N/D		1.0				
	AROCLOR 1260	N/D		1.0				
SW-846	TCLP METALS (1311):		mg/l			MV	12/27/99	
6010A	ARSENIC	N/D		1.0	5.0 D004			
6010A	BARIUM	N/D		10	100 D005			
6010A	CADMIUM	N/D		0.50	1.0 D006			
6010A	CHROMIUM	N/D		1.0	5.0 D007			
6010A	LEAD	N/D		1.0	5.0 D008			
7470A	MERCURY	N/D		0.10	0.2 D009			
6010A	SELENIUM	N/D		0.50	1.0 D010			
6010A	SILVER	N/D		1.0	5.0 D011			
SW-846 8260B	TCLP VOLATILES (1311):		mg/l			DGB	12/27/99	
	BENZENE	N/D		0.50	0.5 D018			
	CARBON TETRACHLORIDE	N/D		0.50	0.5 D019			
	CHLOROBENZENE	N/D		0.50	100 D021			
	CHLOROFORM	N/D		0.50	5.0 D022			
	1,2-DICHLOROETHANE	N/D		0.50	0.5 D028			
	1,1-DICHLOROETHYLENE	N/D		0.50	0.7 D029			
	METHYL ETHYL KETONE	N/D		10	200 D035			
	TETRACHLOROETHYLENE	N/D		0.50	0.7 D039			
	TRICHLOROETHYLENE	N/D		0.50	0.5 D040			
	VINYL CHLORIDE	N/D		0.20	0.2 D043			
SW-846 8270B	TCLP SEMI-VOLATILES (1311):		mg/l			DGB	12/23/99	SL
	1,4-DICHLOROBENZENE	N/D		2.0	7.5 D027			LH
	2,4-DINITROTOLUENE	N/D		0.13	0.13 D030			
	HEXACHLOROBENZENE	N/D		0.13	0.13 D032			
	HEXACHLOROBUTADIENE	N/D		0.13	0.5 D033			LH
	HEXACHLOROETHANE	N/D		2.0	3.0 D034			LH
	NITROBENZENE	N/D		2.0	2.0 D035			
	PYRIDINE	N/D		2.0	5.0 D038			
	TOTAL CRESOL	N/D		10	200 D026			
	PENTACHLOROPHENOL	N/D		3.0	100 D037			
	2,4,5-TRICHLOROPHENOL	N/D		2.0	400 D041			
	2,4,6-TRICHLOROPHENOL	N/D		2.0	2.0 D042			

*SAMPLE pH MEASURED IN WATER AT 20°C.

SL Surrogate spike indicates low recovery.

LH QC indicates low recovery for this analyte.

Norman Brooks

Norman Brooks

Customer Service Quality Manager ext. 130



WASTE CHARACTERIZATION DATA CHANGE FORM BFI VERSION

IMPORTANT: THIS FORM IS TO BE COMPLETED AND SIGNED BY A BFI REPRESENTATIVE WHO HAS HAD PERSONAL CONTACT WITH THE GENERATOR'S REPRESENTATIVE. THIS FORM CANNOT BE USED FOR CHANGES TO THE FOLLOWING: Special Waste WCD sections 2(a), (b), (c), and (d); 7 and 9; Petroleum Soils WCD sections 2(a), (c), (e); 4; and 6. THIS FORM MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK.

1. GENERATOR INFORMATION

a) Generator's Name: PARKER AMCHEM d) Original WCD Number: AB 55796
 b) Generating Facility Address: 32100 STEPHENSON BFI Laboratory Number 228815
 City MADISON HGT. State MI. Zip 48071
 c) Description of the Waste: Name: RANDY CLEMENT
NON - HAZARDOUS FILTER Title: FACILITY MANAGER
PRESS SLUDGE Date 2-15-95 Time _____ Tel No. (810) 583-9300
 Fax No. () _____

2. AMENDMENTS

The following changes are to be noted for the above referenced Waste Characterization Data form:

a) Section: A ☒ Addition ☐ Deletion ☐ Change
 Describe: NON - HAZARDOUS FILTER PRESS SLUDGE

b) Section: B ☒ Addition ☐ Deletion ☐ Change
 X Describe: Wastewater from R&D labs is treated in system (see attached)
Laboratories discharge water soluble cleaners and treatment chemicals
Containing acids/alkalis, chromates/phosphates

c) Section: 6 ☒ Addition ☐ Deletion ☐ Change
 X Describe: Filter cake solids 20-25% + Water 75-80% = 100%
Filter cake solids contains: PO₄ 20-50%, Ca 20-30%, Zn 2-10%
Fe 1-4%, Cr 0.5-1%, Ni 0.2-2%

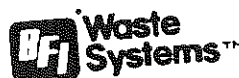
d) Section: _____ ☐ Addition ☐ Deletion ☐ Change
 Describe: _____

3. BFI CERTIFICATION

I hereby certify that I made personal contact with the generator or authorized generator representative identified above, on the date and time and at the telephone number shown above, and that all amendments shown above are complete and accurate summarizations of my conversations with the generator or generator's authorized representative. I further certify that there are no deliberate or willful omissions of misrepresentations on my part contained in the above amendments.

X DATE _____ X PRINT NAME _____ X SIGNATURE _____

BFI Initiator: CLAUDIA BURCH Location _____
 Company Number: 687 Date: 2-15-95 Telephone _____



Recycled paper

Claudia J. Burch
Landfill Sales Representative
Michigan Landfills

BROWNING-FERRIS INDUSTRIES
10690 Six Mile Road
Northville, Michigan 48187

(810) 347-9888
Fax (810) 347-9899



WCD No. AB

55796

BROWNING-FERRIS INDUSTRIES

BFI WASTE CODE

WASTE APPROVAL REQUEST

BFI to complete this area.

BFI Initiator: CLAUDIA BURCH
Location: AH
Company Number: 687
Telephone: (810) 347-9888
Fax: (810) 347-9899
Date: 1-30-95

Action Requested: ☒ New Waste Approval
☐ Up-Date Approval - Previous Number: _____
Disposal Site Requested: AH
Company Number: 687
Management Method Requested: ☒ Landfill ☐ Hauling
☐ Other _____

COUNTY: OAKLANDWASTE CHARACTERIZATION DATA
SPECIAL WASTE

IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED.

1. GENERATOR INFORMATION

a) Generator's Name: PARKER AMCHM
b) Generating Facility's Address: 32100 STEPHENSON
City: MADISON HILLS State: MI Zip: 48071
c) Generator's Representative: RAWDY CLEMENT
Title: FACILITY MANAGER
Telephone: (810) 583-9300
Fax: (810) 582-4825
d) Emergency/Information Contact: J GARAVANTA
Title: REG. AFFAIRS DIR.
Telephone: (810) 583-9300

e) State/Provincial/Local Registration No.: _____
Generator's EPA Id. No.: _____
Industry Description/SIC Code: _____
f) Customer's Name: SAME
g) Customer's Mailing Address: _____
City: _____ State: _____ Zip: _____
h) Representative: _____
Telephone: () _____
Fax: () _____

2. GENERAL WASTE STREAM INFORMATION

a) Name/Description of The Waste: NON-HAZARDOUS FILTER PRESS SLUDGE
b) Process Generating Waste: LABORATORY WASTE STREAMS, METAL CLEANERS
c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No
If yes, describe the waste and the process generating the waste prior to treatment: _____
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations? ☐ Yes ☒ No
If yes, enter the Waste Identification Number if one has been assigned: _____
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations?
☐ Yes ☒ No If yes, enter Waste Identification Number: _____
f) Recommended personal protection equipment and special handling procedures: AS REQUIRED
g) Anticipated Volume: 60 ☒ Cubic Yards ☐ Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
Other _____ Per: ☒ Year ☐ Month ☐ Week ☐ Day ☐ One Time ☐ Other _____
To be transported in: ☒ Bulk ☐ Drums (type/size) _____ ☐ Other _____
h) Is a representative sample included? ☒ Yes ☐ No

3. WASTE PROPERTIES AT 72°F

a) Physical State:
☒ Solid ☐ Semi-solid
☐ Powder ☐ Liquid
☐ Combination
b) Layers:
☒ Single-layered ☐ Bi-layered ☐ Multi-layered
c) Color(s): GRAY
Describe _____
d) Odor:
Describe _____
☒ None ☐ Mild ☐ Strong

e) Density Range: _____ to _____
☒ N/D ☐ lbs/gal. ☐ g/cc.
☐ lbs./yd.³ ☐ Kg/m³ ☐ Other _____
f) Flash Point, °F:
☐ ≤ 72 ☐ 73-100 ☐ 101-140
☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D
g) pH:
☐ ≤ 2 ☐ 2.1-5.0 ☒ 5.1-9.0
☐ 9.1-12.4 ☐ ≥ 12.5 ☐ N/A ☐ N/D



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12610 Newburgh Road
Livonia, Michigan 48150
(313) 591-1855, Fax (313) 591-3331

ANALYTICAL REPORT

October 23, 1998

Henkel Corporation
32100 Stephenson Highway
Madison Hgts., MI 48071

MEI Report Number: 5109
MEI Sample Number: 015649

Project Name: n/a
Project Number: n/a

Date Submitted: 10/05/98
Purchase Order: P102183

Sample Description: Filter Press Sludge
Collection Date: 09/30/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
10 MDNR METALS by TCLP						
Arsenic	<0.100	ppm	0.100	7060	10/13/98	MLC
Cadmium	<0.100	ppm	0.100	7130	10/13/98	MLC
Chromium	<2.00	ppm	1.00	7190	10/13/98	MLC
Copper	<2.50	ppm	2.50	7210	10/13/98	MLC
Lead	<1.00	ppm	1.00	7420	10/13/98	MLC
Mercury	<0.050	ppm	0.200	7470	10/13/98	MLC
Selenium	<0.500	ppm	0.500	7740	10/13/98	MLC
Silver	<0.500	ppm	0.500	7760	10/13/98	MLC
Zinc	<2.00	ppm	2.00	7950	10/13/98	MLC

RCRA CHARACTERISTICS ANALYSIS

Ignitibility	>140° F	Deg. F	n/a	1010	10/09/98	MLC
Corrositivity pH Units	8.0	S. U.	n/a	9045	10/09/98	MLC
As Cyanide	ND	mg/L	0.01	9010	10/09/98	MLC
As Sulfide	13.4	mg/L	0.01	9030	10/09/98	MLC

TCLP SEMI - VOLATILES FRACTION

Hexachlorobenzene	ND	mg/L	0.10	8270	10/22/98	JDM
2,4-Dinitrotoluene	ND	mg/L	0.10	8270	10/22/98	JDM
Hexachlorobutadiene	ND	mg/L	0.10	8270	10/22/98	JDM
Nitrobenzene	ND	mg/L	0.10	8270	10/22/98	JDM
2,4,6-Trichlorophenol	ND	mg/L	0.10	8270	10/22/98	JDM
Hexachloroethane	ND	mg/L	0.10	8270	10/22/98	JDM
Pyridine	ND	mg/L	0.10	8270	10/22/98	JDM
Pentachlorophenol	ND	mg/L	0.10	8270	10/22/98	JDM
o-Cresol	ND	mg/L	0.10	8270	10/22/98	JDM
m-Cresol	ND	mg/L	0.10	8270	10/22/98	JDM
p-Cresol	ND	mg/L	0.10	8270	10/22/98	JDM
4,5-Trichlorophenol	ND	mg/L	0.10	8270	10/22/98	JDM



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(313)591-1855, Fax (313)591-3331

ANALYTICAL REPORT

October 23, 1998

Henkel Corporation
32100 Stephenson Highway
Madison Hgts., MI 48071

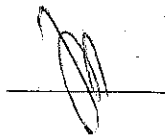
MEI Report Number: 5109
MEI Sample Number: 015649

Project Name: n/a
Project Number: n/a

Date Submitted: 10/05/98
Purchase Order: P102183

Sample Description: Filter Press Sludge
Collection Date: 09/30/98

Parameters	Results	Units	MDL	Method	Analysis Date	Analyst
TCLP VOLATILE FRACTION						
Vinyl chloride	ND	mg/L	0.025	8240	10/22/98	JDM
zene	ND	mg/L	0.025	8240	10/22/98	JDM
Carbon tetrachloride	ND	mg/L	0.025	8240	10/22/98	JDM
1,2-Dichloroethane	ND	mg/L	0.025	8240	10/22/98	JDM
Trichloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
1,1-Dichloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
Tetrachloroethylene	ND	mg/L	0.025	8240	10/22/98	JDM
Chloroform	ND	mg/L	0.025	8240	10/22/98	JDM
1,4-Dichlorobenzene	ND	mg/L	0.025	8240	10/22/98	JDM
Chlorobenzene	ND	mg/L	0.025	8240	10/22/98	JDM
Methyl ethyl ketone	ND	mg/L	0.025	8240	10/22/98	JDM
TCLP Pesticides						
Chlordane	ND	ppm	0.040	8080	10/22/98	MH
Endrin	ND	ppm	0.004	8080	10/22/98	MH
Heptachlor	ND	ppm	0.004	8080	10/22/98	MH
Heptachlor epoxide	ND	ppm	0.004	8080	10/22/98	MH
Lindane	ND	ppm	0.004	8080	10/22/98	MH
Methoxychlor	ND	ppm	0.004	8080	10/22/98	MH
Toxaphene	ND	ppm	0.040	8080	10/22/98	MH
TCLP Herbicides						
2,4-D	ND	ppm	0.05	8150	10/22/98	SAM
2,4,5-TP	ND	ppm	0.05	8150	10/22/98	SAM

Reviewed By: 

HAZARDOUS WASTE INSPECTION

RCRIS

DEQ

Date: 9-21-99 ID#: MID 057676 124
Facility's Name: Henkel / ~~Henkel~~ Surface Technologies just drop 1991
Facility Location Address: _____
City: _____ Zip: _____ County Name: _____

WASTE CODE	PROCESS WASTE IS GENERATED FROM
	Filter Cake
	Phosphates

Reason for the Inspection: _____ Routine _____ Follow-up _____ Complaint

PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER

INSPECTOR(S) NAME	AGENCY	TELEPHONE NUMBER

Thomas Snell
Primary business of the facility: no longer have container storage shed.
George Bayer on vacation, Tech. Serv. Mgr.
Tam Snell
James M. Landis
During 1 Quarter went over all 6 reg's.

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated hazardous waste? _____ no X yes
(if yes send a copy of this cover sheet to SWQD)

Bob permitted
Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of
eration(s): distillation fractionation thin-film evaporation solvent extraction air or stream stripping (if yes send a copy of this cover sheet to AQD)

Mark - will send unrec waste & lamp handout.

MANIFEST REVIEW LOG

FACILITY NAME _____ DATE _____

ID NUMBER _____

MANIFEST NUMBER	G2	LB	DATE	WASTE CODES	QUANTITY
3/1/99 (Shipped 4/99)					
D002	30g		D001	30g	N213 55g
	20			SS	61044 30g
400P	5			20	
280	5				
	20				
	80				
	60				
D003	5g				
	5g				
P106	5g				

notes:

G2 - Generator 2nd copy
LB - land ban

GENERATOR INSPECTION FORM

Facility's Name _____

Part 3 Rules

Date _____ ID# _____

1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH

(rev. 01/29/97 - EAB)

_____ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected N/A - Not Applicable

YES NO NI N/A

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	GGR	<input checked="" type="checkbox"/> NI N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c)) <i>only F. kr Press Sludge</i>	GRR	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3)) <i>Co. Said</i>	GGR	<input checked="" type="checkbox"/> NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	GGR	<input checked="" type="checkbox"/> NI N/A
---	-----	--

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

3. Copies of the manifest readily available for review & inspection (matched)? (Section 11138(1)(f))	GMR	<input checked="" type="checkbox"/> NI N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	GMR	<input checked="" type="checkbox"/> NI N/A
5. Manifests, prepared by the generator (Rule 304(1)(a): 40 CFR 262.20(a)), contain the following?	GMR	NI N/A
a) Manifest document number. (Rule 304(2)(a): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
b) Generator's name, address, phone & ID # (Rule 304(2)(b): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
c) Name & ID # of the transporter. (Rule 304(2)(c): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
d) Name, address & ID # of TSDF. (Rule 304(2)(d): 40 CFR 262.20(b)&(c))	GMR	<input checked="" type="checkbox"/> NI N/A
e) DOT description of waste(s). (Rule 304(2)(e): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
f) Quantity of waste, type & # of containers. (Rule 304(2)(f): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
g) Hazardous waste number of the wastes. (Rule 304(2)(g): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
h) Generator signature, initial transporter & date of acceptance? (Rule 304(4)(a)&(b): 40 CFR 262.23(a)(1)&(2))	GMR	<input checked="" type="checkbox"/> NI N/A
6. Submitted copy of manifests to director no later than 10 days after month shipment was made? (Rule 304(4)(d))	GMR	<input checked="" type="checkbox"/> NI N/A
7. Is the transporter used properly licensed under Act 451, Part 111? (Rule 304(1)(c))	GPT	<input checked="" type="checkbox"/> NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(f or g).

8. Using manifest that has expired? (Rule 304(2): 40 CFR 262.20(a))	GMR	<input checked="" type="checkbox"/> NI N/A
9. Reportable exceptions. (Rule 308(3): 40 CFR 262.42)		
a) Number of manifests generator <u>HASN'T</u> receive signed copy from TSD w/in 35 days.	GRR	N/A
b) Manifests generator <u>HASN'T</u> submitted exception reports to RA & DEQ after 45 days.	GRR	N/A

YES NO NI N/A

10. Facility have written program to reduce volume/toxicity/recycle wastes? (Rule 304(2)(I):40 CFR 262.20(a))

GMR

☐

NI N/A

OR

11. Facility discuss program in place to reduce volume/toxicity/recycle of wastes? (Rule 304(2)(I): 40 CFR 262.20(a))

GMR

☒

NI N/A

WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)

12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a))

a) All listed wastes?

GLB

☒

NI N/A

b) All characteristic wastes?

GLB

☒

NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ each shipment? (40 CFR 268.7(a)(1))

GLB

☐

NI N/A

OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with each shipment? (40 CFR 268.7(a)(2))

GLB

☐

NI N/A

OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with each shipment? (40 CFR 268.7(a)(3))

GLB

☐

NI N/A

OR

16. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go w/ each shipment? (40 CFR 268.7(a)(8))

GLB

☐

NI N/A

17. Did the notice include: (40 CFR 268.7(a)(1)(I-v) or 268.7(a)(2)(I)(A-D) or 268.7(a)(3)(I-iv))

a) EPA hazardous waste #?

GLB

☐

NI N/A

b) If wastewater or non-wastewater as defined in 268.2(d&f)?

GLB

☐

NI N/A

c) Subcategory of the waste (such as D003 reactive cyanide) if applicable?

GLB

☐

NI N/A

d) Manifest number associated with the shipment?

GLB

☐

NI N/A

e) Waste analysis data, where available?

GLB

☐

NI N/A

f) Waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)

GLB

☐

NI N/A

UNLESS

g) Did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1)(ii))

GLB

☐

NI N/A

h) Underlying hazardous waste constituents (except vanadium and zinc), reasonably be expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)

GLB

☐

NI N/A

18. Other than notices for waste exceeding treatment standards, did notices include:

a) If the notice is for shipments that meet the standards does the notice include the certification?

GLB

☒

NI N/A

b) If the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?

GLB

☒

NI N/A

mg & char. of paint filters & light bulbs

YES NO NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

19. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(5))	GLB	<input checked="" type="checkbox"/> NI N/A
20. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a on-time notice stating same in the facility file? (40 CFR 268.7(a)(6))	GLB	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
21. All notices/certifications/demonstrations/other documents retained for 5 years on-site? (40 CFR 268.7(a)(7))	GLB	<input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3)

22. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR 268.3(a))	GLB	<input checked="" type="checkbox"/> NI N/A
--	-----	--

TREATMENT STANDARDS (40 CFR 268.40)

23. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR 268.40(c))	GLB	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
--	-----	---

BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

24. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	GRR	<input checked="" type="checkbox"/> NI N/A
25. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	GRR	<input checked="" type="checkbox"/> NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

26. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	GPT	co. said <input checked="" type="checkbox"/> observed <input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
27. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	GPT	co. said <input type="checkbox"/> observed <input type="checkbox"/> <input type="checkbox"/> NI N/A
28. On containers 110 gallons or less, is there a warning, generator's name, address, manifest document & waste code? (Rule 305(1)(d): 40 CFR 262.32(b))	GPT	co. said <input type="checkbox"/> observed <input type="checkbox"/> <input type="checkbox"/> NI N/A
29. If required, are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	GPT	<input type="checkbox"/> NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

30. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) Containers have accumulation date & visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) Container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	GPT	<input type="checkbox"/> NI N/A
c) Is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	GPT	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
d) Has more than 90 days elapsed since date marked? (Rule 306(1))	GPT	<input type="checkbox"/> NI N/A

UNLESS

e) The generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	GPT	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
--	-----	---

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) Are containers in good condition? (265.171)	GMC	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
g) Are containers compatible with waste in them (265.172)	GMC	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
h) Are containers stored closed? (265.173(a))	GMC	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

1 Paul open (oil) w/ no label

- Difficult to view containers

1 55 gal Drum w/ waste coils

Pallets broken

		YES	NO	NI	N/A
Containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	GMC			NI	N/A
Ignitable & reactive wastes stored 15 meters (50 feet) from property line? (265.176)	GMC			NI	N/A
Are containers inspected weekly for leaks and defects? (265.174)	GMC			NI	N/A
Did the generator document the inspections in 30(k)? (Rule 306(1)(a)(I))	GMC			NI	N/A
Inspection documents maintained on-site 3 years? (Rule 306(1)(a)(I))	GMC			NI	N/A
Are incompatible wastes stored in separate containers? (265.177(a))	GMC			NI	N/A
Hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	GMC			NI	N/A
Incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	GMC			NI	N/A
31. If hazardous waste is being accumulated at the point of generation:					
Container(s) < 55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	GMC			NI	N/A
Container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	GMC			NI	N/A
Container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	GMC			NI	N/A
Are the container(s) marked with the hazardous waste number? (Rule 306(2))	GMC			NI	N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(I) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

Are container(s) in good condition? (265.171)	GMC			NI	N/A
Are container(s) compatible with waste in them? (265.172)	GMC			NI	N/A
Container(s) closed when not in use & managed to prevent leaks? (265.173(a))	GMC			NI	N/A
32. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste? (Rule 306(2): 40 CFR 262.34(c)(2))					
Mark the container with the date the excess amount began accumulating?	GMC			NI	N/A
Move to an area with secondary containment?	GMC			NI	N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

33. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include: N/A					
Impervious base free of cracks? (264.175(b)(1))	GMC			NI	N/A
Sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	GMC			NI	N/A
Hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	GMC			NI	N/A
Run-on prevented unless sufficient capacity? (264.175(b)(4))	GMC			NI	N/A
Accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	GMC			NI	N/A
If accumulating solids (other than F020, F021, F022, F023, F026, F027), is hazardous waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c))	GMC			NI	N/A

Closure of accumulation area(s) is under question 50.

Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? Explain any yes answer.		NI	N/A
Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	GMC		NI N/A
Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, groundwaters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	GMC		NI N/A
Is hazardous waste accumulated in tanks? If so, complete Tank System inspection form.		NI	N/A
Is hazardous waste placed on drip pads? If so, complete Wood Preserving inspection form.		NI	N/A

YES NO NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16

PERSONNEL TRAINING (265.16)

40. Do personnel training records contain the following: <i>everyone em. lab, maintenance</i>			
a) Job title? (265.16(d)(1))	GPT	<input type="checkbox"/>	NI N/A
b) Job descriptions? (265.16(d)(2))	GPT	<input type="checkbox"/>	NI N/A
c) Name of employee filling each job? (265.16(d)(1))	GPT	<input type="checkbox"/>	NI N/A
d) Description of type & amount of both introductory & continued training? 265.16(d)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
e) Training designed so facility personnel can respond to emergencies? (265.16(a)(3))	GPT	<input checked="" type="checkbox"/>	NI N/A
f) Records of training? (265.16(d)(4))	GPT	<input checked="" type="checkbox"/>	NI N/A
g) Do new personnel receive required training within 6 months? (265.16(b))	GPT	<input checked="" type="checkbox"/>	NI N/A
h) Do training records show personnel have taken part in annual training? (265.16(c))	GPT	<input checked="" type="checkbox"/>	NI N/A
i) Training by person trained in haz. waste management procedures? (265.16(a)(2))	GPT	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.

PREPAREDNESS AND PREVENTION (265.30-265.37)

41. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	GPT	<input checked="" type="checkbox"/>	co. said <input checked="" type="checkbox"/> observed <input type="checkbox"/>	NI N/A
42. If required, does this facility have the following equipment:				
a) Internal communications or alarm systems? (265.32(a))	GPT	<input checked="" type="checkbox"/>		NI N/A
b) Telephone or 2-way radios at the scene of operations? (265.32(b))	GPT	<input checked="" type="checkbox"/>		NI N/A
c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	GPT	<input checked="" type="checkbox"/>		NI N/A
d) Adequate volume of water and/or foam available for fire control? (265.32(d))	GPT	<input checked="" type="checkbox"/>		NI N/A
43. Testing and Maintenance of Emergency Equipment:				
a) Owner/operator test & maintain emergency equipment to assure operation? (265.33)	GPT	<input checked="" type="checkbox"/>		NI N/A

NOTE: Access to communication or alarm system is applicable only if required 40 CFR 265.32

b) Has owner/operator provided immediate access to internal alarms? (265.34(a&b))				
i) When hazardous waste is being poured, mixed, etc.	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A
ii) One employee on the premises while facility is operating.	GPT	<input checked="" type="checkbox"/>		NI N/A
c) Aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A
44. Has the facility made arrangements with local authorities? (265.37(a)&(b))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

45. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	GPT	<input checked="" type="checkbox"/>		NI N/A
46. Does the contingency plan contain the following information:				
a) Actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a&b))	GPT	<input checked="" type="checkbox"/>		NI N/A
b) Describe arrangements or attempts w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A
c) Name, addresses & phone (office & home) of emergency coordinator? (265.52(d))	GPT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NI N/A

updated every 3yrs
3/18/99 Mar

		YES	NO	NI	N/A
d)	List emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	GPT	<input checked="" type="checkbox"/>	NI	N/A
e)	Evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	GPT	<input checked="" type="checkbox"/>	NI	N/A
47. Emergency Coordinator and Emergency Procedures:					
a)	Coordinator familiar with site operation & emergency procedures? (265.55)	GPT	<input checked="" type="checkbox"/>	NI	N/A
b)	Emergency coordinator have authority to carry out the contingency plan? (265.55)	GPT	<input checked="" type="checkbox"/>	NI	N/A
c)	If emergency occurred, did coordinator followed emergency procedures? (265.56)	GPT	<input type="checkbox"/>	NI	N/A
d)	Fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	GPT	<input type="checkbox"/>	NI	N/A
48. Contingency plan Amendments and Copies:					
a)	Amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	GPT	<input checked="" type="checkbox"/>	NI	N/A
b)	Copies of plan on site and sent to local emergency organizations? (265.53)	GPT	<input type="checkbox"/>	NI	N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

49.	Has the facility imported or exported hazardous waste?	GOR		NI	N/A
a)	Exporting, has the generator:	GOR		NI	N/A
i)	Notified the Administrator in writing? (262.52(a))	GOR	<input type="checkbox"/>	NI	N/A
ii)	Receiving country consented to accept waste. (262.52(b))	GOR	<input type="checkbox"/>	NI	N/A
iii)	Has copy of EPA Acknowledgment of Consent. (262.52(c))	GOR	<input type="checkbox"/>	NI	N/A
iv)	Compiled with manifest requirements Rule in 309(2)(a-i).	GOR	<input type="checkbox"/>	NI	N/A
v)	If required, was an exception report filled. (309(3)(a-c))	GOR	<input type="checkbox"/>	NI	N/A
b)	Importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	GOR	<input type="checkbox"/>	NI	N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114.

ACCUMULATION AREA CLOSURE (265.111 & 265.114)

50. The accumulation area must be closed in a manner that: (265.111 & 265.114)					
a)	Minimizes need for further maintenance.	GMC	<input type="checkbox"/>	NI	N/A
b)	Controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or haz. waste constituents, leachate, run-off to ground/surface waters and air.	GMC	<input type="checkbox"/>	NI	N/A
c)	All contaminated equipment, structures, and soil properly disposed of.	GMC	<input type="checkbox"/>	NI	N/A

Comments:

Documentation of how waste is segregated

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
JORDON E. GUYER
KERRY KAMMER
ELLWOOD A. MATTSON
O. STEWART MYERS
RAYMOND POUPORE

John Engler, Governor
DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN DISTRICT HEADQUARTERS
Waste Management Division
38980 Seven Mile Road
Livonia, MI 48152

March 7, 1991

Mr. George J. Beyer
Technical Manager, Analytical and Support
Henkel Corporation - Parker+Amchem
32100 Stephenson Highway
Madison Heights, Michigan 48071

RE: MID 057676124

Dear Mr. Beyer,

On February 20, 1991 an inspection was conducted at your facility located at 32100 Stephenson Highway, Madison Heights, Michigan. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 P.A. 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

1. You have not inspected the storage facility since November of 1990 contrary to requirement of weekly and daily inspection as required under 40 CFR 265.15(a).
2. Two employees Shawn Dolan and Jim Wenzel have not been trained as required under 40 CFR 265.16(b) and 265.16(c). Please go through your record and have those people in your facility that come in contact with hazardous waste trained and document such training. Make sure such trainings are made available to the coordinators.
3. According to Mr. Jack Garavanta, the emergency coordinator has changed and your emergency contingency plan has not reflected that change as required 40 CFR 265.54.

Pinnacle
JAN 21

RECEIVED
MAR 14 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 5

Mr. George J. Beyer
Henkel Corporation - Parker+Amchem
Page 2 of 2, 3-4-91.

4. One drum of waste paint sludge and mineral spirit dating from December 1990 was neither labelled nor marked clearly with the words "Hazardous Waste" as required under R. 299.9614(1)(b) and the same container has not been inspected since November 1990 as required under 265.174.
5. The satellite accumulation in your paint room was missing the following:
 - (i) The drums were not marked with the hazardous waste number. (Rule 302(2)).
 - (ii) The drums were not stored open while not in use. (265.173(a)).
 - (iii) You exceeded the 55-gallon-limit and did mark the drums with date the excess amount started accumulating. This drum should be moved to your storage area. (262.34(c)(2))

We request your response by April 2, 1991 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 953-0241.

Sincerely,



Donald Mbamah
Environmental Quality Analyst.

DM/dm
Enclosure
cc: B. Okwumabua
U.S. EPA, Region V

RCRA/ACT 64 INSPECTION REPORT

I.D. Number (U.S. EPA or Michigan) M 1 D 0 5 7 6 7 6 1 2 4

FACILITY NAME PARKER ~~CHRYSLER~~ AMCHEM HENKEL CORP.

Mailing Address 32100 STEPHENSON HIGHWAY
Madison Heights Michigan 48071
 City Zip Code

DATE 2/20/91 TIME (from) 10:00 AM (to) 1:30 PM

PERSON(S) INTERVIEWED	TITLE	TELEPHONE #
George Beyer	Technical Mgr	
Jack Garavanta		

INSPECTOR(S)	AGENCY	TELEPHONE #
Donald Mbamah	MDNR	313 253 0241

Primary Business of this Facility: Research & Development of metal finishing chemicals

Reason for Inspection: (Under closure (Not yet closed))

☒ Routine ☐ Follow-up ☐ Complaint

Based upon the inspection, this facility:

FORM

_____ is a non-generator
 _____ conditionally exempt small quantity generator
 _____ small quantity generator inspection form - - - - - - - - - -A
 _____ generator inspection form B
 _____ tank(s) system inspection form - - - - - - - - - -B1
 _____ transporter inspection form C

PERMITTED TSDF

_____ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D
 _____ generator appendix inspection form D1
 _____ tank system storage inspection form (Subpart J) - - - - -D2
 _____ surface impoundments inspection form (Subpart K) D3
 _____ waste piles inspection form (Subpart L) - - - - -D4
 _____ land treatment inspection form (Subpart M) D5
 _____ landfill inspection form (Subpart N) - - - - -D6
 _____ incineration inspection form (Subpart O) D7
 _____ miscellaneous units inspection form (Subpart X) - - - - -D8

INTERIM STATUS TSDF

_____ treatment/storage/disposal facility (Subpart A-E & I) - - - - -D9
 _____ generator appendix inspection form D1
 _____ groundwater monitoring (Subpart F) use w/ Subparts K,L,M&N D10
 _____ tank system storage inspection form (Subpart J) - - - - -D2
 _____ surface impoundments inspection form (Subpart K) D11
 _____ waste piles inspection form (Subpart L) - - - - -D12
 _____ land treatment inspection form (Subpart M) D13
 _____ landfills inspection form (Subpart N)- - - - -D14
 _____ incineration & thermal treatment inspection form (Subpart O&P) D15
 _____ chemical, physical & biological treatment form (Subpart Q) - - -D16

COMMENTS:

Henkel

Henkel Corporation
Parker+Amchem

May 5, 1990

Ms. Cheryl Howe
Senior Environmental Engineer
Hazardous Waste Permits Section
Waste Management Division
Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Subject: Revised Closure Plan...
Hazardous Waste Container Storage Area

Reference: Henkel Corporation - Parker+Amchem
Madison Heights, Michigan
MID 057 676 124

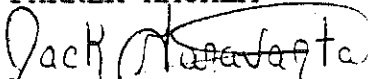
Dear Ms. Howe:

Enclosed are four (4) copies of the above subject closure plan for the above referenced facility. The plan reflects the revisions outlined in your March 9, 1990 "notice of deficiency/letter of warning".

We appreciate your cooperation in this matter. If there are any questions, please do not hesitate to contact me at (313) 583-9300.

Very truly yours,

PARKER+AMCHEM


Jack Garavanta, Manager
Regulatory Affairs

Enclosures

bcc: G. Beyer
J. Richter
R. Walker

HENKEL CORPORATION - PARKER+AMCHEM
MADISON HEIGHTS, MICHIGAN
MID 057676124

CLOSURE PLAN
REVISED: MAY 10, 1990

SUBPART G CLOSURE AND POST CLOSURE

265.110 APPLICABILITY

A. CLOSURE

This section applies to the storage of hazardous wastes in the drum storage area.

- B. This section which applies to owners and operators of disposal facilities does not apply to the Parker+Amchem, Madison Heights facility.

265.111 CLOSURE PERFORMANCE STANDARD

- A. Parker+Amchem will close the facility in a manner that:

1. Minimizes the need for further maintenance, and
2. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

265.112 CLOSURE PLAN

The Part A application facility drawing showed two drum storage areas. This Closure Plan will address only "waste drum storage area no. 1." Attached to this Plan is a diagram showing the basic design of "waste drum storage area no. 1" and the soil sampling locations. Background soil samples will be taken from the facility's front lawn.

"Waste drum storage area no. 2" ceased use on February 11, 1987. The floor was inspected and found not to be cracked. The area was cleaned and the floor was sealed.

A. WRITTEN PLAN

1. Hazardous waste in the drum storage area will be removed to a proper disposal site within ninety (90) days after receiving the final volume of hazardous wastes. After waste removal and clean closure certification, this facility will operate as a "generator" of hazardous wastes subject to the administrative rules of Michigan Act 64.

2. a. The maximum inventory of drums in storage is 195 drums.

b. Type of drum waste stored:

D001...Ignitable	Paint solvents
	Ammonium Persulfate
D002...Corrosive	Acids, Alkalies
D003...Reactive	Arsenic, Mercury, Cyanide
D006...EP Toxic	Cadmium
D007...EP Toxic	Chromium
D008...EP Toxic	Lead
D009...EP Toxic	Mercury

c. Drums are stored in an enclosed building with a concrete floor and curbing with no outlets.

3. a. Drums will be removed to disposal as per closure schedule. The wastes stored within the drum storage area are:

D001	ignitable	
D002	corrosive	
D006----		cadmium
D007	--- EP Toxic...	chromium
D008		lead
D009----		mercury
001D		
003D		

b. Soil samples will be analyzed by an outside accredited laboratory for the following parameters:

Ph	
Cyanide	
Total Metals ----	Arsenic
	Cadmium
	Chromium
	Lead
----	Mercury

4. After removal and off site disposal of all hazardous waste inventory, the drum storage area (including containment curbs) will be decontaminated with a detergent wash and double rinse. All waste waters and residues generated during the wash/rinse cycles will be contained within the containment area, collected, and pumped into drums. The estimated volume of decontamination wash/rinse liquid is anticipated to be less than 100 gallons per cycle.

Drums of wash/rinse water will be moved to the on site waste water treatment system. This system now treats the facility's waste water. The effluent meets all applicable parameters for pre-treatment prior to being discharged to the City of Detroit sewer system.

5. Work will be supervised by Parker+Amchem and performed by an outside contractor. Personnel will be equipped with appropriate protective clothing to ensure the workers' health and safety during the operation. Chemical neutralizers and spill control equipment will be available and will be employed in the event of a spill resulting from the cleaning operations.
6. Hazardous waste sampling methods, soil sampling methods, parameters, and test methods will be conducted in accordance with procedures outlined in "Test Methods for Evaluating Solid Waste", Section 1.2, USEPA Manual SW-846 (see attachment).

B. SCHEDULE FOR CLOSURE

- | | |
|---|----------|
| 1. Thirty days after MDNR approval of the closure plan. | Day 0 |
| 2. Disposal of final inventory of drummed waste. | 90 days |
| 3. Core sampling and analysis. | 100 days |
| 4. Decontamination of storage area. | 120 days |
| 5. Restoration of the storage area for generator accumulation. | 150 days |
| 6. Completion of the closure and Certification submitted to MDNR. | 180 days |

265.114 DISPOSAL OR DECONTAMINATION OF EQUIPMENT

The limited hazardous waste drum storage area obviates the use of heavy equipment for closure activities. Decontamination of equipment will be restricted to a single transfer pump, and steam and water rinse hoses.

The transfer pump decontamination will consist of a steam cleaning and a water rinse of the exterior of the pump and its associated hoses. Equipment contamination wastes will be confined within the drum storage area. These waters will be pumped into a 55 gallon drum and disposed of at the on site waste water treatment system.

265.115 CERTIFICATION OF CLOSURE

Upon completion of closure activities, the owner will submit to the MDNR a certification of closure signed by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. The certification will include supporting documentation as follows:

- A. A certification statement signed by both the owner and the independent registered professional engineer that the closure plan has been completed according to its terms or as per any subsequent amendments.
- B. A summary of decontamination procedures and how waste waters and miscellaneous solid materials (e.g. rags, boots, etc.) were disposed.
- C. All core sampling analytical results and procedures with specific references, weather conditions, run-off controls, and decontamination procedures.
- D. Results of all tests including charts, tables, lab sheets, and observation notes.
- E. A copy of the approved closure plan and the agency letter of closure plan approval.
- F. A copy of all manifests for hazardous wastes sent off-site for treatment and/or disposal.
- G. A QA/QC report on analytical activities.

265.142 COST ESTIMATE FOR FACILITY CLOSURE

A. DRUM STORAGE AREA

1. Drum disposal...based on a maximum
of (195) drums of waste, including
transportation... \$28,000.00
2. Site cleanup...includes labor
and materials... *Drum storage* \$ 2,500.00
3. Soil testing... \$ 3,000.00

B. CERTIFICATION

Estimated certification cost by
an independent, registered
professional engineer... \$ 4,000.00

C. TOTAL COSTS...FACILITY CLOSURE

Total Cost... \$37,500.00

MISCELLANEOUS

As listed in the "Notice of Deficiency", dated March 9, 1990; MDNR requested two additional items be entered into the closure plan.

1. The name of the facility contact person for closure activities is:

George J. Beyer
Analytical Support Manager

Alternate: Jack Garavanta
Regulatory Affairs Manager

Facility address: 32100 Stephenson Highway
Madison Heights, Michigan 48071

Telephone Number: (313) 583-9300

2. Henkel Corporation - Parker+Amchem will notify the MDNR Waste Management Division, Hazardous Waste Permits Section (517) 373-9881 and the MDNR Northville District (313) 344-4670 at least five work days in advance of the following activities:

- a. Storage pad decontamination
- b. Soil sampling
- c. Soil excavation and resampling (if necessary)
- d. Restoration of the storage pad for generator accumulation.

Attachments

I. METHODS USED TO SAMPLE DRUMMED HAZARDOUS WASTE INVENTORY

<u>HAZARDOUS WASTES:</u>	D001	Ignitable
	D002	Corrosive
	D006	EP Toxic cadmium
	D007	EP Toxic chromium
	D008	EP Toxic lead
	D009	EP Toxic mercury

For the above listed hazardous wastes:

SAMPLING METHOD: Sampling a drum from "samplers and sampling procedures for hazardous waste streams", EPA 600/2-80-018, page 36.

DESCRIPTION OF SAMPLING: Composite sample from multiple containers, reference section "D" random samples, EPA 600/2-80-018, January, 1980, page 67.

REFERENCE FOR SAMPLE: Test method for the evaluation of solid waste, physical/chemical methods (SW-846).

[NOTE: No listed wastes are in the inventory.]

II. PARAMETERS AND TEST METHODS FOR DRUMMED WASTE

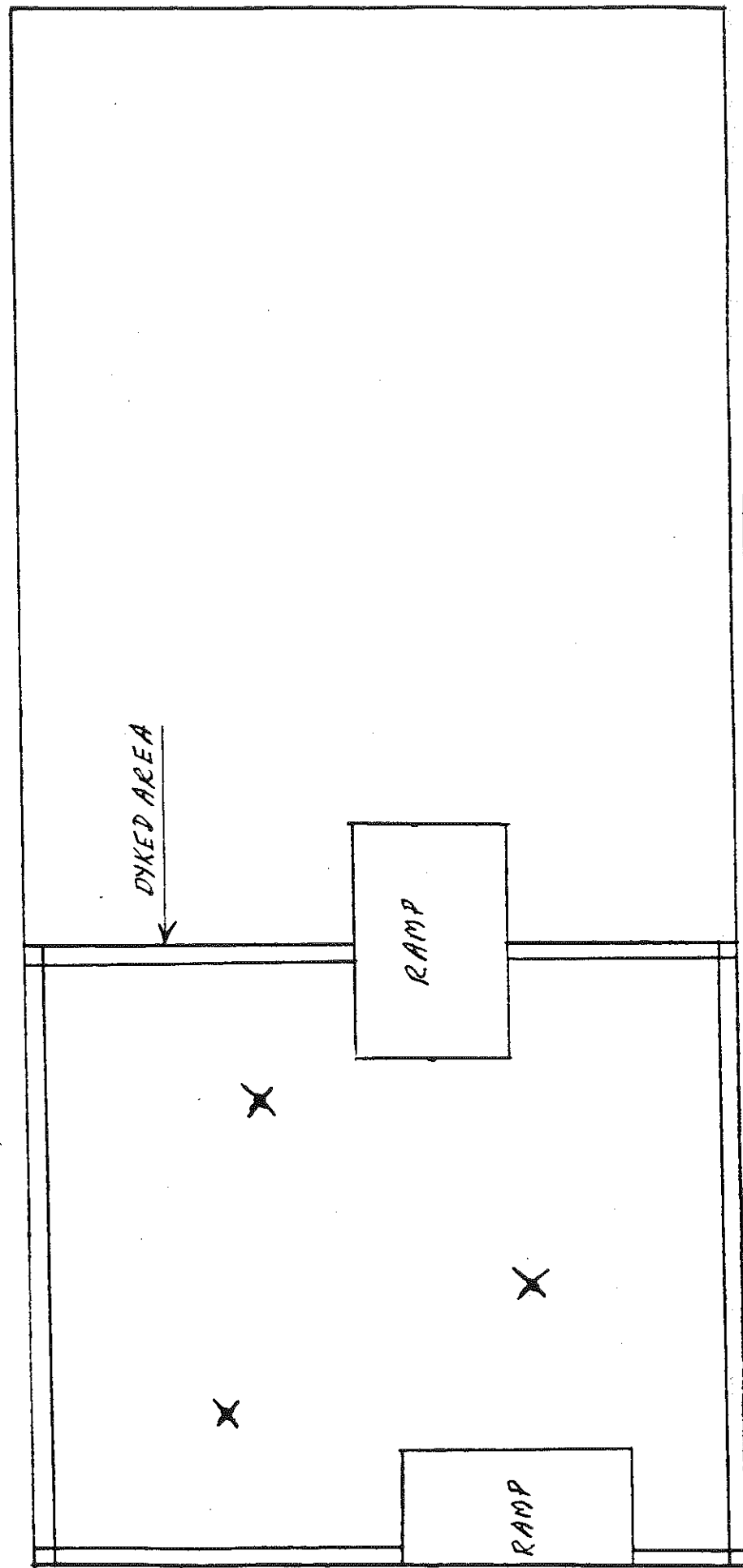
<u>PARAMETER</u>	<u>TEST</u>
pH	Method 5.2
Flash Point	Peneky-Martena Closed Cup Tester Method 4.0
Corrosivity	Method 5.2
EP Toxicity	EP Toxicity Appendix II 264.24

REFERENCE: USEPA Manual SW-846... "Test Method for Evaluation of Solid Waste, Physical/Chemical Methods"

WASTE STORAGE AREA NO. 1 (SHED)

X = CORE SAMPLING LOCATION

NORTH



Contingency Plan and Emergency Procedures
and
SPCC Plan

1. Purpose:

In the event of an emergency at the Madison Heights facility due to fire, explosion, or any unplanned release of ~~hazardous waste~~ to air, soil or surface water, a definite plan is necessary to minimize hazards to human health or the environment.

The provisions of this plan must be carried out immediately whenever there is an emergency due to fire, explosion, or ~~release of hazardous waste~~.
unplanned

2. Responsibility *Plan Implementation*

The order of responsibility for implementing this plan is as follows:

1. Roger Walker, Vice President, Operations
Office: (313) 583-9300 (X-4613)
Residence: (313) 540-9480
2. Jack Garavanta, Regulatory Affairs Manager
Office: (313) 583-9300 (X-4830)
Residence: (313) 641-7367
3. Dave Grandy, Director, Human Resources
Office: (313) 583-9300 (X-4603)
Residence: (313) 375-9541
4. George Beyer, Technical Manager (SPCC Plan Coordinator)
Office: (313) 583-9300 (X-2364)
Residence: (313) 689-8363
5. Don Cole, Maintenance Foreman (SPCC Alternate Coordinator)
Office: (313) 583-9300 (X-2303)
Residence: (313) 629-9838

→ Home address must be included per 265.52(d)

2
Done
P. Beyer
H. Grandy

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-282-4704 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

UNIT

1. Generator Name: **Waste Management, Inc.**
2. Generator Address: **4215 E. 14th Ave., Detroit, MI 48210**
3. Generator Phone: **313-487-2200**
4. Transporter 1 Company Name: **Waste Management, Inc.**
5. Transporter 1 Address: **4215 E. 14th Ave., Detroit, MI 48210**
6. Transporter 1 Phone: **313-487-2200**
7. Designated Facility Name: **Waste Management, Inc.**
8. Designated Facility Address: **4215 E. 14th Ave., Detroit, MI 48210**
9. Designated Facility Phone: **313-487-2200**
10. EPA ID Number: **26-0000000000**

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Other
HM FLAMMABLE LIQUID, N.O.S.		No. Type			
		1	1		

16. Additional Description: **FLAMMABLE LIQUID, N.O.S.**

17. Special Handling Instructions: **FLAMMABLE LIQUID, N.O.S.**

18. GENERATOR'S CERTIFICATION: I certify that the waste has been properly classified, packaged, labeled, and shipped in accordance with applicable international and national regulations.

19. If I am a large quantity generator, I certify that I have taken the necessary steps to ensure that the waste is managed in a manner that minimizes the present and future threat to public health and the environment.

20. Printed/Typed Name: **Bill Drake**

21. Date: **12/30/97**

22. Discrepancy Indication: **None**

23. Facility Name: **Waste Management, Inc.**

HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL NOTICE TO PETRO-CHEM
PROCESSING, INC.

On manifest number 111-2199789 line item 11a (A, B, C or D),
the waste bearing the EPA hazardous waste number(s) 11a F003 AND F004 & F005

is subject to the land disposal restrictions of 40 CFR Part 268. In accordance with 40 CFR 268.7, this generator is providing notice that the waste does not meet the treatment standards specified in Part 268 Subpart D or does not meet the prohibitions specified in 268.32 or RCRA section 3004(d). The treatment standards follow:

Hazardous waste description	Constituents of concern	Nonwastewater		
		Total composition, mg/kg	TCLP, mg/L	Wastewater, total composition, mg/L
<input type="checkbox"/> F001 - Spent halogenated solvents used in degreasing	Carbon tetrachloride		0.96	0.05
	Methylene chloride		0.96	0.20
	Tetrachloroethylene		0.05	0.079
	1,1,1-Trichloroethane		0.41	1.05
	Trichloroethylene		0.091	0.062
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.96	1.05
	Trichlorofluoromethane		0.96	0.05
<input type="checkbox"/> F002 - Spent halogenated solvents	Chlorobenzene		0.05	0.15
	1,2-Dichlorobenzene		0.125	0.65
	Methylene chloride		0.96	0.20
	Methylene chloride (from the pharmaceutical industry)		—	0.44
	Tetrachloroethylene		0.05	0.079
	1,1,1-Trichloroethane	7.6	0.41	1.05
	1,1,2-Trichloroethane			0.030
	Trichloroethylene		0.091	0.062
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.96	1.05
	Trichlorofluoromethane		0.96	0.05
<input checked="" type="checkbox"/> F003 - Spent non-halogenated solvents	Acetone		0.59	0.05
	n-Butyl alcohol		5.0	5.0
	Cyclohexanone		0.75	0.125
	Ethyl acetate		0.75	0.05
	Ethyl benzene		0.053	0.05
	Ethyl ether		0.75	0.05
	Methanol		0.75	0.25
	Methyl isobutyl ketone		0.33	0.05
	Xylene		0.15	0.05
<input checked="" type="checkbox"/> F004 - Spent non-halogenated solvents	Cresols (and cresylic acid)		0.75	2.82
	Nitrobenzene		0.125	0.66
<input checked="" type="checkbox"/> F005 - Spent non-halogenated solvents	Benzene	3.7		0.070
	Carbon disulfide		4.81	1.05
	2-Ethoxyethanol	Incineration		Biological degradation or incineration
	Isobutanol		5.0	5.0
	Methyl ethyl ketone		0.75	0.05
	2-Nitropropane	Incineration		(Wet oxidation or chemical oxidation) followed by carbon adsorption; or incineration
	Pyridine		0.33	1.12
	Toluene		0.33	1.12

Check the appropriate box(es), and, circle each chemical entity likely to be present in each waste number.

Circle each of the following characteristic wastes also likely to be present in the waste.

Waste Code	Description	Wastewaters	Nonwastewaters
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, or INCIN
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT
D004	Arsenic (As)	268.43(a)	268.41(a) Variance until 5-8-
D005	Barium (Ba)	268.43(a)	268.41(a)
D006	Cadmium (Cd)	268.43(a)	268.41(a)
D007	Chromium (Cr)	268.43(a)	268.41(a)
D008	Lead (Pb)	268.43(a)	268.41(a)
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a) Variance until 5-8-
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC Variance until 5-8-
D010	Selenium (Se)	268.43(a)	268.41(a)
D011	Silver (Ag)	268.43(a)	268.41(a)
Other Codes	See attachment for supplemental list		

(Check if applicable) This waste is principally an organic liquid, and therefore, it is my best judgement that this material presents substantially the same environmental risk as P001-P005 spent solvents, and this, should be restricted from land disposal.

Generator Firm Name: PARKER + ARCHEM

Generator Signature: George J. Signa

Name & Title of Generator: Technical Manager

EPA ID No.: 111DD57676124 Date: 2-8-91

RJP080190HTI
LDR33

[illegible]

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility:

Parker Amchem Benkel Corp

U.S. EPA ID No.:

MD 057676124

Street:

32100 Stephenson Highway

City:

Madison Hgts State: MI Zip: 48071

Telephone:

313

Inspection Date:

2/20/91Time: 10:00 (am/pm)

Weather Conditions:

Inspectors:

NameAgency/TitleTelephoneD. M. AMATHMDNR313 953 0241

Facility Representatives:

George Beyer

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents ^{for} <u>3.45</u>	<u>✓</u>	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
F020-F023 and F026-F028	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
California List *	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
First Third [40 CFR 268.10]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Second Third [40 CFR 268.11]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Third Third [40 CFR 268.12]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

LDR Waste Management:

Summary:

Signature:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F001, F002, F003, F004, F005	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ☒ No ☐ NA ☐

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ☐ No ☐ NA ☒

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

☐ Organometallics: 40 Part 268, Appendix IV constituents

☐ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ☐ No ☐ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ 50 to 500 ppm PCBs

☐ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☐ No ☐ NA ☐

If yes, check the appropriate treatability group:

- ☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☐ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☐

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☐

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

<u>Waste Code</u>	<u>Cal List Applicability</u>	<u>Expiration Date</u>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content.

Yes ___ No ___ NA ___

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
 ___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ___ No ___ NA ___

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ___

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	___	___/___/___
___	___	___/___/___
___	___	___/___/___

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	___	___	___
___	___	___	___
___	___	___	___

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☐ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☒ No ☐ NA ☐

*See Appendix G for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☐

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☒

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☒ Based on a detailed chemical and physical analysis of a representative sample
☒ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ___

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☒ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments TSD

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☒ No ___ NA ___

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ___ No ☒ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☐ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☐ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ☐ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☒ No ___ NA ___

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☒ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☒ No ☐ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
waste waste	waste	water treatment unit -
		permitted
		for discharge

2. Are treatment residuals generated from these units?

Yes ☒ No ☐

Comments filed with

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes _____ No ✓ NA _____

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist: _____

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
California List Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>

Comments _____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? ____/____/____

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

☒ Generator provides data

☒ Facility performs analyses in on-site laboratory

☒ Facility contracts analyses at off-site laboratory

- water going out
- Clayton, Canton

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☐ No ☐ NA ☒

own waste

If analyses are conducted off site, identify lab: _____

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☐ No ☐ NA ☐

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☐ NA ☐

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☒ No ☐ NA ☐

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ☒ No ☐ NA ☐

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ☒ No ☐ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No ☐

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ☐ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ☐ No ☒ NA

If yes, state how: _____

2. Are prohibited wastes stored on site in tanks? NA

Yes ☐ No ☒ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☐ No ☐

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☐ No ☐ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how: _____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ☒

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ☒

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ___ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes ___ No ___ NA ___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes ___ No ___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes ___ No ___ NA ___

4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ____ No ____

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ____ No ____

Comments _____

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes ____ No ____ (If No, go to c.)

List the wastes _____

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ____ No ____

If yes, is this method used for the aggregated wastes?

Yes ____ No ____

Comments _____

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ____ No ____

Comments _____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

Yes ___ No ___ (If No, go to F.)

List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes ___ No ___

Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code _____
 Supernatant Yes ☐ No ☐ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments _____

F. Land Disposal

NA

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☐ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments _____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA ___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ___ No ___

If yes, at what frequency are analyses performed? _____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) _____

Case-By-Case Extension (40 CFR 268.5) _____

No-Migration Petition (40 CFR 268.6) _____

Treatment Standard Variance (40 CFR 268.44) _____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ☒ No ☐ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☒ No ☐ NA ☐

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☒ No ☐ NA ☐

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

_____	_____
_____	_____
_____	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☐ No ☐ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ☒ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

5. **Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions**

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes No (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
------------	--------------------

[illegible]

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes _____ No _____

6. **Dilution Prohibition [40 CFR 268.3]:**

- a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes No

Comments

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes No ☒ (If No, go to c.)

Check appropriate category:

Dilutes to meet treatment standards

Dilutes to render waste non-hazardous

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Parker Amchem Henkel Corp
 U.S. EPA ID No.: MD 057676124
 Street: 32100 STEPHENSON HIGHWAY
 City: Madison Hgts State: MI Zip: 48071
 Telephone: 313

Inspection Date: 2/29/91 Time: 10⁰⁰ (am/pm)

Weather Conditions: _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>D. MBAMAH</u>	<u>MONR</u>	<u>313 953 0241</u>

Facility Representatives: George Beyer

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>3, 4, 5</u>	_____	_____	<u>90 day st.</u>	<u>3, 4, 5</u>
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	_____	_____	_____	_____	_____
Third Third [40 CFR 268.12]	_____	_____	_____	_____	_____

* See Appendix A

(Chromic waste)

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

LDR Waste Management:

Summary:

Signature:

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management Division
505 W. Main
Northville, MI 48167

March 16, 1989

Mr. Greg Beyer
Technical Manager Analytical & Support
Parker & Amchem
32100 Stephenson Hwy.
Madison Hgts., MI 48071

LB-1X

RE: MID 057676124

Dear Mr. Beyer,

On February 15, 1989, an inspection was conducted at your facility located at 32100 Stephenson Hwy., Madison Hgts., MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirement(s):

1. Land Disposal Restrictions. As a generator of California list waste (pH<2), you have not determined if your waste is restricted from land disposal nor the appropriate treatment standard. Also, you have not provided notice, in writing, to the treatment facility. 40 CFR 268.7.

The notice must include the EPA hazardous waste number, corresponding treatment standard, manifest number associated with the shipment of waste and waste analysis data, where available.

2. Containers of hazardous waste were not placed in the storage area in such a way that adequate aisle space was maintained.

Page 2, 3-16-89
Parker & Amchem
RE: MID 057676124

The facility should allow enough aisle space so that a person can inspect all containers and place containers so that all dates and labels are visible.

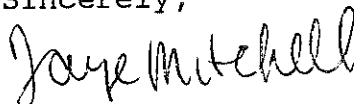
Also, containers of hazardous waste were not always inspected weekly for leaks and defects. 40 CFR 265.174.

3. We are conducting financial reviews for interim status facility. I have not yet received a copy of the facility financial assurance mechanism for closure cost and liability coverage. 40 CFR 265 Subpart H. Please submit those documents to our office as soon as possible.

We request your response by April 17, 1989 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Sincerely,



Faye Mitchell
Environmental Quality Analyst

FM:bs
Enclosure
cc: B. Okwumabua

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

XXXXXXXXXXXXXXXXXXXX

Gordon E. Guyer, Director
Waste Management Division
505 W. Main
Northville, MI 48167

June 11, 1987

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

*Don't
violate
etc*

RECEIVED
JUN 15 1987
SOLID WASTE DIVISION
U.S. EPA REGION V

Parker Chemical Co.
32100 Stephenson Hwy.
Madison Hgts., MI 48071
ATTN: George J. Beyer, Mgr.
Technical Support Dept.

RE: MID 057676124

Dear Mr. Beyer,

This letter is to acknowledge receipt of your letter dated June 1, 1987 indicating your compliance program for deficiencies cited during my inspection on May 14, 1987. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please contact me at (313) 344-4670.

Sincerely,

Faye Dade
Environmental Quality Analyst

FD:bs

cc: U.S. EPA, Region V
B. Okwumabua



PARKER CHEMICAL COMPANY
32400 STEPHEN A. HIGGINS WAY
MADISON HILLS, MICHIGAN 48071
313/583-9300

June 1, 1987

RECEIVED

JUN 02 1987

HAZARDOUS WASTE DIV.

Ms. Faye Dade
Environmental Quality Analyst
MICHIGAN DEPARTMENT OF NATURAL RESOURCES
Waste Management Division
505 West Main
Northville, MI 48167

Reference: MID 057676124

Dear Ms. Dade,

In response to your letter of May 20, 1987, following your RCRA inspection of our facility, we will comply with Title 40, Code of Federal Regulations 268.7 (a) (1) as follows.

Future F-Solvent waste disposals from this facility will be through a licensed disposal contractor; however, we (Parker Chemical Company) will notify, in writing, the treatment facility of the applicable information, i.e.:

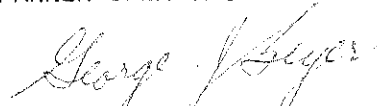
- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standard;
- (iii) The manifest number associated with the shipment of waste; and
- (iv) Waste analysis data, where available.

This information will be attached, as an addendum, to the Hazardous Waste Manifest when the listed waste leaves this facility.

If you have any further questions (or comments) concerning this matter, please contact me at (313) 583-9300, x. 2364.

Very truly yours,

PARKER CHEMICAL COMPANY


George J. Beyer, Manager
Technical Support Department

GJB/mjh

cc: R. Walker

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

~~XXXXXXXXXXXXXX~~
Gordon E. Guyer, Director
Waste Management Division
505 W. Main
Northville, MI 48167

May 20, 1987

NATURAL RESOURCES COMMISSION

IAS J. ANDERSON
ENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

RECEIVED
JUN 29 1987

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Parker Chemical
32100 Stephenson Hwy.
Madison Heights, MI 48071
ATTN: George Beyer

RECEIVED

JUN 29 1987

RE: MID 057676124

SOLID WASTE DIVISION
U.S. EPA, REGION V

Dear Mr. Beyer,

On May 24, 1987, acting as a representative of the United States Environmental Protection Agency under the provision of the Resource Conservation and Recovery Act (RCRA) state authorization, I performed an inspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of that facility with the requirements of RCRA F-Solvent Land Restriction.

As a result of that inspection, it has been determined that you may generate and disposed off-site, F-solvents wastes. Therefore, the facility will need to comply with the following requirement:

1. For each shipment of restricted waste, the generator must notify the treatment facility (including recyclers) in writing of the appropriate treatment standard. The notice must include the EPA waste number, applicable treatment standard, manifest number and waste analysis data, if available. 40 CFR 268.7 (a) (1).

If the F-solvent waste meets treatment standards, the generator must provide the disposal facility with the above information and a certification that the waste meets treatment standards.

We request your response by June 15, 1986 on the above matter. If you have any questions, contact me at (313) 344-4670.

Sincerely,

Faye Dade
Environmental Quality Analyst

FD:bs

Enclosure

cc: U.S. EPA, Region V
B. Okwumabua

Facility Name: PARKER Chemical
ID Number: MD 057676124
Inspector: F. Dede
Date: May 14, 1991

DRAFT
RCRA F-SOLVENT LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

A. Facility Name PARKER Chemical B. Street (or other identifier) 32100 Stephenson Hwy
C. City Madison Heights D. State MT E. Zip Code 48071 F. County Name Oakland
G. Nature of business; identification of operations R + D Metal Finishing Chemicals
H. EPA ID # MD 057676124

I. Facility Contact (Name and Phone Number) George Beyer 313-583-9300

II.A. For onsite facilities, complete the generator checklist

Comments

B. General Facility Standards

1. Was waste analysis plan revised to cover Part 268 requirements [264.13 or 265.13]?
☐ Yes ☒ No *however, may not be necessary, storage only.*
2. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a)/265.13(a)]?
☒ Yes ☐ No
 - a. Did testing include analyses for all F001-F005 constituents?
☒ Yes ☐ No *When appropriate*
 - b. Were analyses performed using TCLP? ☐ Yes ☒ No *Waste does not go directly to landfill.*
 - c. Were analyses conducted onsite or offsite (identify offsite lab)?
☐ On ☐ Off:
 - d. Describe frequency of sampling _____
 - e. Describe procedures used to identify manifest discrepancies _____
3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? ☒ Yes ☐ No

Facility Name: Pepper Chemical
ID Number: _____
Inspector: _____
Date: _____

C. Storage [268.50]

Comments

1. a. Were restricted wastes exceeding treatment standards stored? ☒ Yes ☐ No
If no, go to "D."
- b. Are all containers clearly marked to identify content and date(s) entering storage? ☒ Yes ☐ No
- c. Do operating records track the location, quantity and dates that waste exceeding treatment standards entered and were removed from storage? ☒ Yes ☐ No
- d. Do operating records agree with container labeling? ☒ Yes ☐ No
- e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☒ No
If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☐ No
If yes, state how: _____
- ~~f.~~ Were tanks emptied at least once per year, and do operating records show that volume of waste removed from tanks annually at least equals tank volume? ☐ Yes ☐ No
- ~~g.~~ Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☐ No
If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____
- ~~h.~~ Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? ☐ Yes ☐ No

~~D.~~ Treatment in Surface Impoundments [268.4]

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? ☐ Yes ☐ No

If no, go to E.

Inspector: F. DODGE
Address: 505 W Main
Northville, MT 48147
Telephone No: 313-3444620

DRAFT
RCRA LAND RESTRICTION P-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Parker Chemical B. Street (or other identifier) 32100 Stephenson Hwy
C. City Madison Heights D. State MT E. Zip Code 48071 F. County Name OAKLAND
G. Nature of Business; Identification of Operations R & D : Metal Finishing Chemicals
H. EPA ID # MLD 057676124
I. Handler Contact (Name and Phone Number) George Bayer 313-583-9300

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

- a. F001 ☒ Yes ☐ No
b. F002 ☒ Yes ☐ No
c. F003 ☒ Yes ☐ No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☐ No

- d. F004 ☒ Yes ☐ No
e. F005 ☒ Yes ☐ No

2. Source of the above: Form B700-12 ☐; Part A ☒; Part B ☐;
other (specify) OWN Knowledge

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

B. BDAT Treatability Group - Treatment Standards Identification

Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

☒ Yes ☐ No

during inspection

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes

☒ Yes ☐ No *Listed waste.*

b. TCLP

☐ Yes ☐ No

c. Other (specify) _____

If knowledge, note how this is adequate:

product is pure solvent, waste is same

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note any problems: _____

- d. Were wastes tested using TCLP when a process or wastestream changed?

☐ Yes ☐ No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No
☐ Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]

☐ Yes ☒ No

D. Management

1. Onsite management

a. Were F-solvent wastes managed onsite?

☐ Yes ☒ No

If yes, answer 1(b) and (c); if no, answer 2.

Handler Name: Parker Chemical
ID Number: _____
Inspector: _____
Date: _____

Comments

- b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted?
____ Yes ____ No

If yes, TSD Checklist must be completed.

- c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
____ Yes ____ No

2. Offsite Management

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

- (i) EPA waste number? ____ Yes ☒ No
(ii) Applicable treatment standard? ____ Yes ☒ No
(iii) Manifest number? ____ Yes ☒ No
(iv) Waste analysis data, if available?
____ Yes ____ No

Identify offsite treatment facilities Petro-chem, ENSCO

- b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

- (i) EPA Hazardous waste number? ____ Yes ____ No
(ii) Applicable treatment standard? ____ Yes ____ No
(iii) Manifest number? ____ Yes ____ No
(iv) Waste analysis data, if available?
____ Yes ____ No
(v) Certification that waste meets treatment standards? ____ Yes ____ No

Identify land disposal facilities receiving the BDAT certified wastes _____

Handler Name: Parker Chemical
ID Number: _____
Inspector: _____
Date: _____

Comments

- c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SOG) [268.50(a)(1)]?

☒ Yes ____ No

If yes, was facility operating as a TSD under interim status or final permit?

☒ Yes ____ No

If yes, TSD Checklist must be completed.

☒ Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

____ Yes ____ No

If yes, list type of treatment unit and processes

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
EILENE J. FLUHARTY
HEN V. MONSMA
C. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

December 4, 1985

Mr. George J. Beyer
Parker Chemical Company
32100 Stephenson Highway
Madison Heights, Michigan 48071

Re: MID 057676124

Dear Mr. Beyer:

This letter is to acknowledge receipt of your letter dated November 27, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on October 31, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, appearing to read "Faye Dade".

Faye Dade
HAZARDOUS WASTE DIVISION

FD:mlm

cc: U.S. EPA, Region V
B. Okwumabua



PARKER CHEMICAL COMPANY

November 27, 1985

Ms. Faye Dade
DEPARTMENT of NATURAL RESOURCES
Hazardous Waste Division
Southeast Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

RECEIVED
DEC 02 1985
HAZARDOUS WASTE DIV.

Re: MID057676124

Dear Ms. Dade:

Pursuant to your Resource Conservation and Recovery Act (RCRA) inspection and notification of violation on November 4, 1985, the following steps have been taken to correct our records so that the items and schedule of inspection conforms to Title 40, Code of Federal Regulations, 265.15(b)(1).

Our RCRA facility manual now has a written inspection schedule which covers the following items:

- Fire extinguishers
- Breathing equipment (self-contained air pak)
- Communications/Alarms
- Security devices
- Dikes

This schedule includes the frequency of inspection required for each item, as well as the type of problems to be looked for in each area.

If you have any further questions (or comments) concerning this matter, please contact me at 313/583-9300, ext. 2364.

Very truly yours,

PARKER CHEMICAL COMPANY

George J. Beyer/mjh
George J. Beyer, Manager
Technical Support Department

GJB/mjh

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
EILENE J. FLUHARTY
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STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

November 4, 1985

Mr. George Beyer
Parker Chemical Company
32100 Stephenson Highway
Madison Heights, MI 48071

Re: MID 057676124

Dear Mr. Beyer:

On October 30, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 32100 Stephenson Highway, Madison Heights. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

Though you have developed and maintained an inspection schedule at the facility pursuant to 40 CFR 265.15, general inspection requirements, the records do not identify those specific items inspected as specified in 40 CFR 265.15 (b)(1).

You are requested to respond to this letter by December 2, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Faye M. Dade".

Faye Dade
Hazardous Waste Division

FD:m1m

cc: U.S. EPA, Region V
B. Okwumabua

enclosures

RCRA INSPECTION REPORT

EPA Identification Number: M I D 0 5 7 6 7 6 1 2 4

Installation Name: PARKER Chemical

Location Address: 32100 Stephenson Hwy

City: MADISON Heights

State: MICHIGAN

Date of Inspection 10-30-85

Time of Inspection (from) 10³⁰ (to) 12⁰⁰

Person(s) Interviewed

George Beyer

Title

Technical Support
mym

Telephone

313-583-9300

Inspector(s)

EAYE. DADE

Agency/Title

MONR/WATER Quality
Specialist

Telephone

313-459-9180

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (No Generation or Transportation)

A

☐ Generation and Transportation

B,C

☐ Generation Only

B

☐ Transportation Only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)	Inspection Form A section(s)
S01 <input checked="" type="checkbox"/> storage in containers	I
S02 <input type="checkbox"/> storage in tanks	J
T01 <input type="checkbox"/> treatment in tanks	J
S04 <input type="checkbox"/> storage in surface impoundment	K,F
T02 <input type="checkbox"/> treatment in surface impoundment	K,F
D83 <input type="checkbox"/> disposal in surface impoundment	K,F
S03 <input type="checkbox"/> storage in waste pile	L
D81 <input type="checkbox"/> disposal by land application	M,F
D80 <input type="checkbox"/> disposal in landfill	N,F
T03 <input type="checkbox"/> treatment by incineration	O/P
T04 <input type="checkbox"/> treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR <input checked="" type="checkbox"/>	APPENDIX GN
TRANSPORTER <input type="checkbox"/>	APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	—	<u>N/A</u>
b. Facility expansion?	—	—	—	<u>N/A</u>
c. Change of owner or operator?	—	—	—	<u>N/A</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	—	—	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>✓</u>	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	<u>✓</u>	<u>NO offsite Waste Accepted</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	—	—	—	<u>N/A</u>
or				
b. i. Artificial or natural barrier around facility?	—	—	—	<u>N/A</u>
and				
ii. Controlled entry?	<u>✓</u>	—	—	<u>LOCKed shed</u>
c. Danger sign(s) at entrance?	<u>✓</u>	—	—	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>✓</u>	—	—	

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NIA
ii. safety and emergency equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	does not specific document specific items inspected
iii. security devices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. the name of the inspector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. a notation of the observations made?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Not detailed

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NO new personnel
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES

NO

NI

Remarks

____ ✓ ____

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

____ ✓ ____

b. Telephone or 2-way radios
at the scene of operations?

____ ✓ ____

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

____ ✓ ____

Indicate the volume of water and/or foam available for fire control:

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

____ ✓ ____

b. Is emergency equipment
maintained in operable
condition?

____ ✓ ____

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

____ ✓ ____

5. Is there adequate aisle space
for unobstructed movement?

____ ✓ ____

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

____ ✓ ____

documented.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	✓			
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	✓			

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NO emergency occurred yet

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	✓	_____
b. Are records of past shipments retained for 3 years?	—	—	✓	_____
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	✓	_____
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	_____
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓	—	—	_____
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	✓	—	—	_____
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

v. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

vi. All closure and post closure costs as applicable?

✓

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

✓

**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

N/A

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

	YES	NO	NI	Remarks
8. Has the owner or operator developed an <u>outline</u> of a comprehensive ground-water quality assesment program that is capable of determining: 265.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?	_____	_____	_____	_____
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?	_____	_____	_____	_____
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?	_____	_____	_____	_____
*9. Has the owner or operator performed a statistical analysis of his ground-water monitoring data as required in 265.93(b)?	_____	_____	<u>X</u>	_____
*10. Was there a statistically significant increase (or pH decrease) detected in any well?	_____	_____	<u>X</u>	_____
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?	_____	_____	<u>X</u>	_____
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?	_____	_____	_____	_____
a. Is the waiver demonstration maintained at the facility?	_____	_____	_____	_____
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?	_____	_____	_____	_____

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

Section G CLOSURE AND POST CLOSURE (Part 5 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. estimated year of closure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. schedule of closure activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
BB. facility monitoring equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. name, address, and phone number of person or office to contact during post-closure care period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is the written post-closure cost estimate available? 265.144	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

plies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>2</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
F. R. CAROLLO
JOE A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

Hazardous Waste Div
1120 W. State Fair
Detroit, MI 48203

June 28, 1984

*JS
8/1/84
Code R*

Parker Chemical Company
32100 Stephenson Hwy.
Madison Hts., MI 48071

EPA ID No: MID 057676124

Dear Mr. George Beyer:

This letter is to acknowledge receipt of your letter dated June 21, 1984 indicating your compliance program for RCRA deficiencies cited during my inspection on May 23, 1984. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have questions regarding Hazardous Waste Management please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Laura Lodisio
DETROIT DISTRICT OFFICE

LL:pf

cc J. Bohunsky
B. Okwumabua
U.S. EPA



YES
8/1/84
Code R

PARKER CHEMICAL COMPANY
32100 STEPHENSON HIGHWAY
MADISON HEIGHTS, MICHIGAN 48071
313/583-9300

June 21, 1984

Ms. Laura L. Lodisio
Department of Natural Resources
ENVIRONMENTAL PROTECTION BUREAU
1120 W. State Fair Avenue
Detroit, MI 48203

Reference: EPA I.D. No. MID057676124

Dear Ms. Lodisio,

I have listed below (referencing your numbers) the actions which have been taken to correct the RCRA, Subtitle C, violations found at our Madison Heights facility during the RCRA inspection on May 23, 1984.

Items 1 & 2

A training program has been developed for all of the facility employees who handle, or are involved with, our waste. This is being given in two sessions (June 21 & 26, 1984). Following the training sessions, the Personnel training records will be updated.

Item 3

All of the waste drums in this area have been properly identified and labeled as "Hazardous Waste".

Item 4

An inventory list is now available in the RCRA log book which indicates the waste name and quantity at each storage area.

Item 5

Copies of the revised Contingency Plan, dated April 19, 1984, were sent on June 13, 1984, to the local emergency response agencies (Fire Department, Police Department, William Beaumont Hospital - Troy).

If further documentation, or clarification, is necessary, please contact me at 313/583-9300, x.2364.

Very truly yours,

PARKER CHEMICAL COMPANY

George J. Beyer
George J. Beyer, Manager,
Technical Support Department

GJB/mjh

985 7-30-84
Statute 5
Code X

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
R. CAROLLO
JOE A. HOEFER
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STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION BUREAU
1120 W. State Fair Avenue
Detroit, Michigan 48203

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

May 31, 1984

Parker Chemical Company
32100 Stephenson Hwy.
Madison Hts., MI 48071

EPA ID No: MID 057676124

Dear Mr. George Beyer:

On May 23, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 32100 Stephenson Highway, Madison Heights, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

- 1) Facility personnel have not taken part in an annual review of training (last training session was July, 1982) as required per 40 CFR 265.16(c).
- 2) Personnel training records and documents are not current (pending annual review) as required per 40 CFR 265.16(d).
- 3) While being accumulated on-site each container is not labeled or clearly marked with the words "Hazardous Waste" as required per 40 CFR 262.34(a)(3). This is of primary concern in the collection area which you identify as Waste Drum Storage Area No. 3. Because of the various types of waste being collected in this area and the fact that other drums which contain product are stored here it is of prime importance that these wastes are clearly identified to avoid any possibility of a problem from inadvertent mixing, etc...
- 4) The operating record must contain an inventory documenting the location of each hazardous waste within the facility and the quantity at each location. It is noted that there were several drums in storage area number 1, which were not inventoried because they were not yet identified. Also, please be advised that any of the drums taken from the collection points (Areas 2,3,4) and put into storage should be immediately added to this inventory. The drums should be inventoried as soon after they are filled as possible and moved to the contained storage shed (Area 1).

Parker Chemical Company
May 31, 1984
page two

- 5) Copies of the recent (April 19, 1984) revisions to your Contingency Plan have not yet been submitted to the local emergency response agencies as required per 265.53.

You are requested to respond to this letter by June 25, 1984, providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of page one of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION



Laura Lodisio
DETROIT DISTRICT OFFICE

LL:pf
Enclosure

cc J. Bohunsky
K. Burda
EPA

RCRA Inspection Report

EPA Identification Number: M I D 057676124
 Installation Name: PARKER CHEMICAL CO. (SUBSID. OF FORD MC
 Location Address: 32100 STEPHENSON HWY.
 City: MADISON HTS. State: MICHIGAN 48071
 Date of inspection: 05-23-84 Time of inspection (from) 2:00 (to) 3:30

Person(s) interviewed	Title	Telephone
<u>GEORGE BEYER</u>	<u>TECH. SUPPORT MGR.</u>	<u>(313)358-9300</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>LAURA LOUISIO</u>	<u>MONR-RESOURCE SPECIALIST</u>	<u>(313)368-3335</u>
_____	_____	_____

Installation Activity (mark only one box) Inspection Form(s)

- | | |
|---|----------|
| <input checked="" type="checkbox"/> <u>Treatment/Storage/Disposal</u> per 40 CFR 265.1 and/or <u>Generation and/or Transportation</u> | <u>A</u> |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

N.A.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

N.A.

S02 - Line 2; no storage in tanks.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	X	—	
b. Facility expansion?	—	X	—	
c. Change of owner or operator?	X	—	—	Notified 7-29-13. Co still waiting to hear back on financial assurance.
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	—	—	—	Analyze filter code 233/yr. Lab packs other waste are based on knowledge chemicals used.
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	X	No off-site waste.
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	—	X	—	
or				
b. i. Artificial or natural barrier around facility?	—	X	—	
and				
ii. Controlled entry?	X	—	—	Shed locked / or
c. Danger sign(s) at entrance?	X	—	—	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	X	—	—	

*Not Inspected

YES NO NI Remarks

- b. Does the owner or operator have an inspection schedule at the facility? X — —
- c. If so, does the schedule address the inspection of the following items:
- i. monitoring equipment? — — X not required
 - ii. safety and emergency equipment? X — — Conducted & Maintenance
 - iii. security devices? X — — daily.
 - iv. operating and structural equipment (i.e. dikes, pumps, etc.)? X — —
 - v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? X — — - explanation of things to be looked for on top of inspect. sheet.
 - vi. inspection frequency (based upon the possible deterioration rate of the equipment)? X — — - weekly
- d. Are areas subject to spills inspected daily when in use? X — —
- e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? X — —
- f. Does the inspection log contain the following information:
- i. the date and time of the inspection? X — —
 - ii. the name of the inspector? X — —
 - iii. a notation of the observations made? X — —
 - iv. the date and nature of any repairs or remedial actions? X — —
5. Do personnel training records include: 265.16
- a. Job titles? X — —
 - b. Job descriptions? X — —

	YES	NO	NI	Remarks
c. Description of training?	—	<u>X</u>	—	<u>Nothing since</u>
d. Records of training?	—	<u>X</u>	—	<u>July 1982</u>
e. Did facility personnel receive the required training by 5-19-81?	—	<u>X</u>	—	↓
f. Do new personnel receive required training within six months?	—	<u>X</u>	—	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	<u>X</u>	—	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<u>X</u>	—	—	<u>ignitables on</u>
b. No smoking signs?	<u>X</u>	—	—	
c. Separation and protection from ignition sources?	<u>X</u>	—	—	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: 265.31

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

YES NO NI Remarks

— X —

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or alarm systems?

X — —

b. Telephone or 2-way radios at the scene of operations?

X — —

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X — —

- P.A. System.

- Co. has installed an alarm button in store shed which sounds main Bldg.

- Telephones.

- Fire extinguishers

- Absorbent pads, pillow material.

- Soda Ash

- Vermiculite.

Indicate the volume of water and/or foam available for fire control:

City Water Supply

3. Testing and Maintenance of Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X — —

b. Is emergency equipment maintained in operable condition?

X — —

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

X — —

5. Is there adequate aisle space for unobstructed movement?

X — —

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

X — —

Fire systems - outside contract.

Safety equipment done in-house

But need to see them revision in Contingency plan.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X — —

Plan was revised on April 19, 1991 to incorporate chg's due to chg. in ownership & update in closure con.

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X — —

Will send revised Cont. Plan

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X — —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — —

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X — —

(See 1.b.)

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<u>X</u>	—	—	<u>George Bayer</u>
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	—	—	—
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	—	—	—
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	—	—	<u>X</u>	<u>No emergency has occurred.</u>

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	X	} No off-site waste accepted
b. Are records of past shipments retained for 3 years?	—	—	X	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	X	
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	X	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	X	—	—	However need to address Stg. area. #2
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

___ ___ X

Not a disposal
site

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X ___ ___

v. Reports detailing all incidents that required implementation of the Contingency Plan?

___ ___ X

Have had none

vi. All closure and post closure costs as applicable?

X ___ ___

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

X ___ ___

**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?

~~___ ___~~

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

~~___

___~~

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G CLOSURE AND POST CLOSURE (Part 265 subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	<u>X</u>	<u> </u>	<u> </u>	<u>plan revised 4/</u>
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
ii. maximum hazardous waste inventory?	<u>X</u>	<u> </u>	<u> </u>	<u>195 Drums.</u>
iv. estimated year of closure?	<u> </u>	<u> </u>	<u>X</u>	<u>None</u>
v. schedule of closure activities?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c. Has closure begun?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<u> </u>	<u> </u>	<u> </u>	<u> </u>
BB. facility monitoring equipment	<u> </u>	<u> </u>	<u> </u>	<u> </u>
iii. name, address, and phone number of person or office to contact during post-closure care period?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
c. Has the post-closure period begun?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
d. Is the written post-closure cost estimate available? 265.144	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<u>X</u>	___	___	_____
2. Are containers compatible with waste in them? 265.172	<u>X</u>	___	___	_____
3. Are containers managed to prevent leaks? 265.173	<u>X</u>	___	___	_____
4. Are containers stored closed?	<u>X</u>	___	___	_____
5. Are containers inspected weekly for leaks and defects.	<u>X</u>	___	___	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<u>X</u>	___	___	_____
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<u>X</u>	___	___	_____
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>X</u>	___	___	<u>lab packs.</u>

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<u>X</u>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<u>1 manifest for past year</u>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>			
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>none</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>none</u>				

However
shipment
did not
arrive
at
TSD facility
for about
30 days.

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

Remarks:

EXPLANATION OF AREAS NOTED
ON PART A (PAGE 5 OF 5).

- #1. - PRIMARY DIKED STORAGE AREA IN ENCLOSED SHED.
- #2. - COLLECTION AREA FOR SM. QUANTITIES VARIOUS LAB WASTE WHERE THEY ARE SORTED AND PACKED INTO LAB PACKS (THEN TO AREA #1).
- #3. - VARIOUS SOLVENT & PAINT COLLECTION AREA. DRUMS FILLED HERE THEN BROUGHT TO AREA #1.
- #4. - 1 DRUM UNDER FILTER PRESS FOR COLLECTION OF FILTER CAKE THEN SENT TO AREA #1.
- #5. - WASTE WATER TREATMENT COLLECTION TANK PRIOR TO PROCESSING (4-82B) THROUGH FILTER PRESS. (SHOULDN'T BE INCLUDED.)

MID 057 676124

STATE OF MICHIGAN



James J. Blanchard, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

July 27, 1983

NATURAL RESOURCES COMMISSION

ACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

Hazardous Waste Division
Detroit District Office
1120 W. State Fair Ave
Detroit, MI 48203
(313) 368-3335

Parker Surface Treatment Products
Occidental Chemical Corporation
32100 Stephenson Hwy.
Madison Hts., MI 48071

MID 057 676124

Attention: George J. Beyer; Mgr.; Technical Support Dept.

Dear Mr. Beyer:

This letter is to acknowledge receipt of your letter dated July 14, 1983 indicating your compliance program for RCRA deficiencies cited during our inspection on June 14, 1983. We consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have questions regarding Hazardous Waste Management please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Laura L. Lodisio
DETROIT DISTRICT OFFICE

LLL:pf

cc: Ken Burda
J. Bohunsky
U.S. EPA

Occidental Chemical Corporation

July 14, 1983

Ms. Laura L. Lodisio
DEPARTMENT of NATURAL RESOURCES
Hazardous Waste Division
Detroit District Office
1120 W. State Fair Avenue
Detroit, MI 48203

RECEIVED

JUL 15 1983

GAD DETROIT DIST

Reference: EPA I.D. No. MID057676124

Dear Ms. Lodisio,

The violation of the requirements of Subtitle C of RCRA referenced in your letter of June 20, 1983, for our Madison Heights facility, is being corrected.

This requirement for an internal communication or alarm system for our hazardous waste storage shed will be resolved by installing an emergency button ("Panic Button") in the shed with an audible signal in the main facility in the shipping/maintenance areas. This equipment has been ordered and installation will be complete within 30 days.

If further documentation or clarification is necessary, please contact me at 313/583-9300, ext. 2364.

Very truly yours,

OCCIDENTAL CHEMICAL CORPORATION
PARKER Surface Treatment Products



George J. Beyer
Manager
Technical Support Department

GJB/mz



PARKER Surface Treatment Products

32100 Stephenson Highway, Madison Heights, Michigan 48071 313/583-9300

RECEIVED

JUL 28 1983

EPR-FIELD STAFF

*Status 3,
Code*

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

*RES
7/27/83*

James J. Blanchard, Governor
DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director

June 20, 1983

Hazardous Waste Division
Detroit District Office
1120 W. State Fair Avenue
Detroit, MI 48201
(313) 368-3335

*** Parker Surface Treatment Products
Occidental Chemical Corp.
32100 Stephenson Hwy.
Madison Heights, MI 48071

EPA ID No.: MID 057676124

Attention: George Beyer, Technical Support Mgr.

Dear Mr. Beyer:

On June 14, 1983, I conducted an inspection of your facility located at 32100 Stephenson Highway, Madison Heights, MI to evaluate compliance of that facility with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, the following was found:

1. The hazardous waste storage area of the facility is not equipped with an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel or a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio capable of summoning emergency assistance as required per 40 CFR 265.32.

You are requested to respond to this letter by July 15, 1983 providing documentation to this office regarding those actions taken to correct these violations. Please send your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
HAZARDOUS WASTE DIVISION

Laura L. Lodisio

Laura L. Lodisio
DETROIT DISTRICT OFFICE

LLL:pf
Enclosure
cc: U.S.EPA
J. Bohunsky
K. Burda

RECEIVED

JUN 22 1983

EPR-FIELD STAFF

ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER
(or Michigan)

M 1 D 0 5 7 6 7 6 1 2 4

FACILITY NAME

PAKker Chemical

32100 Stephenson Hwy

Madison Heights

CITY

MICHIGAN

48071

ZIP CODE

DATE MAY 14, 1987

TIME OF INSPECTION (FROM) 9⁰⁰ (TO) 11⁰⁰

PERSON(S) INTERVIEWED

TITLE

TELEPHONE

George Beyer

Mgmt. Technical Support

313-583-9300

INSPECTOR(S)

AGENCY/TITLE

TELEPHONE

F. DROE

MDNR/E.O.A.

313-344-4670

Primary Business of this Facility: Research & Development
of Metal Finishing Chemicals

Reason for Inspection:



Routine

☐ Follow-up

☐ Complaint

INSPECTION FORMS:

Based upon the inspection, this facility:

FORM

☐ is a non-generator/conditionally exempt small quantity generator

☐ small quantity generator

☒ generator

☐ transporter

☒ treatment/storage/disposal facility

Date of Last Inspection 10-30-85

AMERICAN

Parker

INSPECTION FORM D
Part 6 of Rules
P.A. 64 of 1979

TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:

- ☒ Generates Hazardous Waste (Also use Generator Appendix)
- ☐ Treats Hazardous Waste
- ☐ Stores Hazardous Waste
- ☐ Disposes of Hazardous Waste
- ☐ Transports Hazardous Waste (Also use Form C)

This Facility:

- ☐ Accepts wastes from off-site sources
- ☐ Handles only its own wastes

If applicable, hazardous waste is stored in the following:

- ☒ Drums (Containers)
- ☐ Above-ground tanks
- ☐ Underground tanks
- ☐ Waste piles
- ☐ Lagoons
- ☐ Other
- ☐ Not applicable

If applicable, hazardous wastes are treated/disposed in the following:
(Attach appropriate checklist)

- ☐ Surface Impoundments
- ☐ Waste piles
- ☐ Land Treatment
- ☐ Landfills
- ☐ Incineration/Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Above-ground tanks

INSPECTION D

____ Underground tanks

____ Drums

____ Other

____ Not applicable

WASTE STREAMS

Hazardous Waste

Code/Name

Source

Type
of Storage

How Much

F006

WWTx Sludge

drums.

D001 / D002

mixed lab. wastes

D007

F001

↓

↓

INSPECTION FORM D
Part 6 Rules
P.A. 64 of 1979

HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY
Applies to Those Facilities That Do Not Have an Act 64 Permit

General Facility Standards
Rule 601, 40 CFR 265, Subpart B

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

1. If required, have the following been notified:

a.) Notified Director of receipt of hazardous waste from a foreign source? 265.12(a)

—	—	✓	II
---	---	---	----

b.) Notified Director of change of owner or operator.
40 CFR Part 270. 265.12(b)

—	—	5/87	II
---	---	------	----

Comments: Change of ownership recently occurred.

2. General Waste Analysis: 265.13

a.) Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)

✓	—	—	I
---	---	---	---

b.) Does the owner or operator have a detailed waste analysis plan on file at the facility? 265.13(b)

✓	—	—	I
---	---	---	---

c.) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)

—	—	✓	I
---	---	---	---

Comments: _____

INSPECTION FORM D

	Yes	No	N/A	Violation Class
3. Security - If applicable, do security measures include:				
a.) 24-hour surveillance? 265.14(b)(1)	<input checked="" type="checkbox"/>			I
or				I
b.) i. Artificial or natural barrier around facility? 265.14(b)(2)(i)				
and				
ii. Controlled entry? 265.14(b)(2)(ii)	<input checked="" type="checkbox"/>			I
c.) Danger sign(s) at entrance? 265.14(c)	<input checked="" type="checkbox"/>			I
			Locked Steel	

Comments: _____

4. Owner or operator inspections: 265.15*

a.) Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? 265.15(a)	<input checked="" type="checkbox"/>			II
b.) Does the owner or operator have a written inspection schedule at the facility? 265.15(b)(1)	<input checked="" type="checkbox"/>			II
c.) If so, does the schedule address the inspection of the following items:				
i. Monitoring equipment? 265.15(b)(1)	<input checked="" type="checkbox"/>			II
ii. Safety and emergency equipment?	<input checked="" type="checkbox"/>			II
iii. Security devices? 265.15(b)(1)	<input checked="" type="checkbox"/>			II
iv. Operating and structural equipment (i.e. dikes, pumps, etc.)? 265.15(b)(1)	<input checked="" type="checkbox"/>			II

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

Violation
Class

Yes

No

N/A

Clear

- | | | | | | |
|------|---|-------------------------------------|--------------------------|--------------------------|----|
| v. | Type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| vi. | inspection frequency (based upon the possible deterioration rate of the equipment)?
265.15(b)(4) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| d.) | Are areas subject to spills inspected daily when in use?
265.15(b)(4) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| e.) | Does the owner or operator maintain an inspection log or summary of owner or operator inspections? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| f.) | Does the inspection log contain the following information:
265.15(d) | | | | |
| i. | The date and time of the inspection? 265.15(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| ii. | The name of the inspector?
265.15(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iii. | A notation of the observations made? 265.15(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iv. | The date and nature of any repairs or remedial actions?
265.15(d) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |

- | | | | | | |
|-----|--|----------|-------------|-------------|----------|
| a.) | Job titles? 265.16(d)(1) | <u>✓</u> | <u> </u> | <u> </u> | <u>I</u> |
| b.) | Job descriptions? 265(d)(2) | <u>✓</u> | <u> </u> | <u> </u> | <u>I</u> |
| c.) | Description of training?
265.16(d)(3) | <u>✓</u> | <u> </u> | <u> </u> | <u>I</u> |

INSPECTION FORM D

	Yes	No	N/A	Violation Class
d.) Records of training? 265.16(d)(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Do new personnel receive re- quired training within six months? 265.16(d)	<input checked="" type="checkbox"/>	<i>however no new personnel</i>	<input type="checkbox"/>	I
f.) Do personnel training records indicate that personnel have taken part in an annual review of training? 264.16(c)	<input checked="" type="checkbox"/>	<i>10/86 11/86</i>	<input type="checkbox"/>	I

Comments: _____

6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
a.) Special handling? 265.17(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) No smoking signs? 265.17(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Separation and protection from ignition sources? 265.17(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

PREPAREDNESS AND PREVENTION
Rule 606, 40 CFR 265, Subpart C

1. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituents 40 CFR Rule 265.31 ☒ I

Comments: _____

INSPECTION FORM D

	Yes	No	N/A	Violation Class
--	-----	----	-----	-----------------

2. If required, does this facility have the following equipment: 40 CFR 265.32

- | | | | | |
|--|---|---|---|---|
| a.) Internal communications or alarm systems. 40 CFR 265.32(a) | ✓ | — | — | I |
| b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b) | ✓ | — | — | I |
| c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c) | ✓ | — | — | I |
| d.) Indicate the volume of water and/or foam available for fire control. | — | — | — | — |

Comments: _____

3. Testing and Maintenance of Emergency Equipment: 265.33

- | | | | | |
|---|---|---|---|---|
| a.) Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33 | ✓ | — | — | — |
| b.) Is emergency equipment maintained in operable condition? 265.33 | ✓ | — | — | — |
| c.) <u>If required</u> , has owner or operator provided immediate access to internal alarms? 40CFR 265.34(a) | ✓ | — | — | — |
| d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment. 40 CFR 265.35. | ✓ | — | — | I |

INSPECTION FORM D

Yes No N/A Violation Class

Comments: _____

4. Has the owner or operator attempted to make arrangements with local authorities in case of emergencies. 40 CFR 265.37

✓ — — II

Comments: _____

CONTINGENCY PLAN AND EMERGENCY PROCEDURES Rule 607, 40 CFR 265 Subpart D.

1. Does the contingency plan contain the following information:

- a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (As applicable). 265.52(a)

✓ — — I

- b.) Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37

✓ — — II

- c.) Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)

✓ — — II

INSPECTION FORM D

Violation
ClassYesNoN/AClass

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|----|
| d.) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| e.) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| f.) Is the facility emergency coordinator identified. 40 CFR 265.55 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| g.) Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan. 40 CFR 265.55 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| j.) Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinators, changes in emergency equipment. 40 CFR 265.54 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |

Comments: _____

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. Are copies of the contingency plan available at site and local emergency organizations. 40 CFR 265.53(a) 264.53(b)

✓	—	—	II
---	---	---	----

Comments: _____

USE OF MANIFEST SYSTEM Rule 601(2)(b)

1. Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following:

- a.) Are copies signed and dated.

Rule 608(1)(a)

I

- b.) Are significant discrepancies noted on the manifest.

Rule 608(1)(b)

I

- c.) Are transporters given 1 copy of the signed manifest.

Rule 608(1)(c)

I

- d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)

I

- e.) Are copies of the manifest retained for 3 years.

I

- f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608 (1)(f)

II

Comments: _____

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. Does this facility ship hazardous waste off-site. If yes, complete Generator Appendix. Rule 608(3)

✓			N/A
---	--	--	-----

Comments: _____

3. For unreconciled significant discrepancies in manifests has the Director been notified. Rule 608(4)

		✓	I
--	--	---	---

Comments: _____

RECORDKEEPING

Rule 601(3) 40 CFR 265. Subpart E

1. Does the owner or operator of this facility maintain an operating record? Rule 609(1)

✓			II
---	--	--	----

Comments: _____

2. Does this operating record contain: 265.73

- a.) The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265.73(b)(1) Appendix E

✓			II
---	--	--	----

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 265.73(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II <i>hazardous waste stored in outdoor shed</i>
c.) If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
d.) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
f.) Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) <u>If required</u> , monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
h.) Closure and post closure cost estimates. 265.73(b)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II

Comments: _____

- i.) Are all required records available and maintained for at least 3 years. 265.74(3)

☒ ☐ ☐ II

INSPECTION FORM D

Yes No N/A Violation
Class

Comments:

REPORTING

1. Has the owner or operator submitted a biennial report to the required administration by March 1 of even numbered years? 265.75

✓ — — — II

Comments:

2. If applicable, for TSD's that receive hazardous waste from off-site sources. Rule 265.76

— — — — I

- a.) Has the facility accepted any hazardous waste from an off-site generator subject to Rule 205 without a manifest or shipping paper?

— — — — I

- b.) If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

— — — — I

USE AND MANAGEMENT OF CONTAINERS Drums/Roll-off Boxes/Gondolas

1. Is hazardous waste accumulated in containers? If no, skip to tank section. ✓

— — — — N/A

- 2 a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c) If no, how many ✓

— — — — I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____ Accumulation dates _____		✓		I
c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many _____	✓			I
d.) Are containers in good condition Rule 306(1)(a), 40 CFR 265.171. If no, specifically what is their conditions. _____	✓			I
e.) Are containers compatible with waste in them. RULE 306(1)(a) 40 CFR 265.172. If no, explain _____	✓			I
f.) Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a) If no, how many _____	✓			I
g.) Are containers managed to prevent leaks? Rule 306(1)(a), 40 CFR 265.173(b) If no, explain _____	✓			I
h.) Are containers inspected weekly for leaks and defects? Rule 306(1)(a) 40 CFR 265.174.	✓			I
i.) Are <u>ignitable</u> and reactive wastes stored at least 15 meters (50 Feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	✓			I
j.) Are incompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	✓			I

INSPECTION FORM D

	Yes	No	N/A	Violation Class
k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
Comments: _____				

3. If storing free liquid, does hazardous waste storage area include: rule 306(1)(a) 40 CFR 264.175.				
a.) Impervious base free of cracks. 40 CFR 264.175(b)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.	<input checked="" type="checkbox"/>	<u>checked</u>	<input type="checkbox"/>	I
Comments: _____				

4. Is hazardous waste being accumulated at the point of generation, Rule 306(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
If yes:				
a.) Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Is container under control or operator and near point of generation and under control of operator? Rule 306(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

INSPECTION FORM D
Violation
Class

d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172

Yes	No	N/A	Class
—	—	—	I

e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173

—	—	—	I
---	---	---	---

f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents) Rule 306(2)

—	—	—	I
---	---	---	---

Comments: _____

TANKS

1. Is hazardous waste accumulated in tanks? If no, skip to c.

—	✓	—	N/A
---	---	---	-----

a.) Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)

—	—	—	I
---	---	---	---

b.) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).

—	—	—	I
---	---	---	---

c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. Rule 306(1)(a), 40 CFR 265.192(c)?

—	—	—	I
---	---	---	---

d.) Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).

—	—	—	I
---	---	---	---

e.) Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194?

—	—	—	II
---	---	---	----

INSPECTION FORM D

Violation

Yes	No	N/A	Class
-----	----	-----	-------

f.) Are reactive and ignitable wastes in tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23 Rule 306(1)(a), 40 CFR 265.199

II

g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.

I

h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)

I

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(See tables 2-1 through 206 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments: _____

2. Do above ground tanks have a 150% containment area constructed of impervious material, or if tanks hold incompatible wastes is each tank structurally enclosed? Rule 615(3)

I

INSPECTION FORM D

Yes No N/A Violation Class

Comments: _____


3. Do owners and operators of underground tanks do all the following:

a.) Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)

b.) Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)

c.) Conduct leachate sampling at least once a year. Rule 615(4)(c)

d.) Maintain an accurate inventory of the tank. Rule 615(4)(d)

	_____	_____	_____	I
	_____	_____	_____	I
	_____	_____	_____	I
	_____	_____	_____	I
	_____	_____	_____	I

Comments: _____

4. Is hazardous waste accumulated in other than tanks or containers?
If yes, explain _____

_____  _____ N/A

Comments: _____

INSPECTION FORM D

CLOSURE AND POST CLOSURE (Part 265 Subpart G)
Part 7 of Act 64 Rules

	Yes	No	N/A	Violation Class
1. Closure 265.112				
a.) Is the facility closure plan available for inspection?	✓	—	—	I
b.) Does the plan identify				
i. maximum extent unclosed during facility life?	✓	—	—	I
ii. maximum hazardous waste inventory?	✓	—	—	I
iii. estimated year of closure	UNKNOWN	—	—	I
iv. schedule of closure activities	✓	—	—	I
Comments:				

*2. Post-Closure 265.118 - Act 64 Rules

a.) Is the post-closure plan available for inspection?	X	—	—	I
b.) Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	—	—	—	I
ii. description of maintenance activities and frequencies for				
AA. integrity of cap. final cover, or containment structures, where applicable.	—	—	—	I
BB. facility monitoring equipment.	—	—	—	I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
iii. name, address, and phone number of person or office to contact during post- closure care period?	_____	_____	_____	I _____
c.) Has the post-closure period begun?	_____	_____	_____	N/A _____
d.) Is the written post-closure cost estimate available? 265.144	_____	_____	_____	I _____

Comments: _____

* Applies only to disposal facilities.

Yes No N/A Violation
Class

GENERATOR APPENDIX

Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements

1. a.) Does the generator have copies of the manifest available for review and on-site. 262.40
- b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.

✓ _____ II
7 _____

Comments: _____

2. Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements:

- a.) Manifest document number (Rule 304(2)(a)?

✓ _____ II

- b.) The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b)

✓ _____ II

- c.) The name and EPA ID number of transporter. Rule 304(2)(c)

✓ _____ II

- d.) Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d)

✓ _____ Chem-met
Mich. Disposal
Petro-chem.
Onsoo, Ark. II

- e.) The description of waste(s) (DOT shipping name, DOT hazard class, DOT identification number. Rule 304(2)(e)

✓ _____ II

GENERATOR APPENDIX

	Yes	No	N/A	Violation Class
f.) The total quantity of waste(s) and the type and number of containers loaded. Rule 304(1)(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) Hazardous waste number describing the wastes. Rule 304(1)(g)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
h.) Certification as required in Rule 304(1)(h)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
i.) Signatures as required in Rule 304(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
j.) Waste minimization program/certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

3. Reportable exceptions. Rule 308(3), 40 CFR 262.42

- a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. X
- b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.

Comments: _____

YES
7/27/83
Status 3
Code X

RCRA Inspection Report

EPA Identification Number: M I D 0 5 7 6 7 6 1 2 4

Installation Name: PARKER SURFACE TREATMENT POTS. - OCCIDENTAL

Location Address: 32100 STEPHENSON HWY. CHEMICAL CORP.

City: MADISON HEIGHTS State: MICHIGAN

Date of inspection: 06-14-83 Time of inspection (from) 1:00 (to) 3:30

Person(s) interviewed

Title

Telephone

GEORGE BEYER

TECHNICAL SUPPORT
MANAGER

(313) 583-9300

Inspector(s)

Agency/Title

Telephone

LAURA LODISIO

MDNR - RESOURCE
SPECIALIST

(313) 368-3335

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation

☐ Treatment/Storage/Disposal (no generation or Transportation)

☐ Generation and Transportation

☐ Generation only

☐ Transportation only

A

A

B, C

B

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input checked="" type="checkbox"/>	storage in tanks	J
T01	<input checked="" type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR ☒
TRANSPORTER ☐

APPENDIX ☒ GN
APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

S02, T01 - No storage or treatment in tanks.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	—	N.A.
b. Facility expansion?	—	—	—	N.A.
c. Change of owner or operator?	✓	—	—	Letter to U.S. EPA dated 07-02-82.
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	Analysis of sludge 2-3 times/year. Analysis of lab pack on individual basis.
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	✓	No off-site waste accepted.
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	—	✓	—	
or				
b. i. Artificial or natural barrier around facility?	—	✓	—	
and				
ii. Controlled entry?	✓	—	—	locked shed.
c. Danger sign(s) at entrance?	✓	—	—	Put up additional sign as required
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	✓	—	—	

*Not Inspected

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

✓

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

— — — N.A

ii. safety and emergency equipment?

— — — - In maintenance

iii. security devices?

✓ — — - All inspections

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

✓ — — conducted by maint. dept

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

✓

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

✓

weekly/bi-weekly

d. Are areas subject to spills inspected daily when in use?

✓

shed

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

✓

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

✓

not time, but not necessary

ii. the name of the inspector?

✓

iii. a notation of the observations made?

✓

iv. the date and nature of any repairs or remedial actions?

✓

5. Do personnel training records include: 265.16

a. Job titles?

✓

b. Job descriptions?

✓

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	lists subjects discuss - no thorough description
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N.A. - No new personnel.
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	One for one in July. It is planned to take place.
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If there is flammable wastes.
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

→ Mr. Beyer has attended corporate level hazardous waste seminars and DOT sponsored training programs. He conducts in-house training for all other employees. They also will be using an Audio-B-3 Visual Presentation used at their Morenci, Mich. Facility.

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: 265.31

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

YES NO NI Remarks

✓

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or alarm systems?

✓

b. Telephone or 2-way radios at the scene of operations?

✓

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓

Alarms & communication are in the plant but not in storage shed. As yet co. feel there has been no need, however, ^{contin} below

*- portable fire extinguishers
- spill control equip
- sorbent pillows
- spill tamer
- containers*

Indicate the volume of water and/or foam available for fire control:

*City water supply -
fire hydrants.*

3. Testing and Maintenance of Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓

b. Is emergency equipment maintained in operable condition?

✓

*- extinguishers - contractor
- all other equip.
inspected by maint. dept*

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

✓

5. Is there adequate aisle space for unobstructed movement?

✓

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

✓

*- written documentation
- they have copies of emergency procedures.*

**the stg. shed is significantly isolated from the main plant and appears there is a need*

for some sort of communication sys. to main plant especially if a person was alone & required emerg. assistance.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

Chain of Command has been designated as required per

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

Fire Police Hospitals } documented July 12, 1988

✓

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

documented

YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

☒ YES ☐ NO ☐ NI

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

☒ YES ☐ NO ☐ NI

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒ YES ☐ NO ☐ NI

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

☐ YES ☐ NO ☒ NI

No emergency has occurred as of yet.

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)			✓	
b. Are records of past shipments retained for 3 years?			✓	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72				
			✓	
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓			
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓			
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	✓			Since last inspection co. has begun to keep in plant inventory.
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

NOTE:

E-1

Chemical Waste Mgt. is designated TSD.

4/82-A

Ohio facility is transport. Alabama site is TSD.

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

✓ — —

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ — —

v. Reports detailing all incidents that required implementation of the Contingency Plan?

✓ — —

vi. All closure and post closure costs as applicable?

✓ — —

Disposal Facility does waste analysis of lab wastes. Co. does analysis of Haz. sludge.

Updated 5-19-83 to include inflation factor.

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

✓ — —

5. **Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

— — —

N.A. - No off-site waste accepted.

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

— — —

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

☒ YES ☐ NO ☐ NI

b. Does the plan identify:

i. maximum extent unclosed during facility life?

☐ YES ☐ NO ☒ NI

ii. maximum hazardous waste inventory?

☒ YES ☐ NO ☐ NI

195 drums - max.
NA.

iv. estimated year of closure?

☒ YES ☐ NO ☐ NI

v. schedule of closure activities?

☒ YES ☒ NO ☐ NI

c. Has closure begun?

☐ YES ☒ NO ☐ NI

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

☐ YES ☐ NO ☐ NI

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

☐ YES ☐ NO ☐ NI

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

☐ YES ☐ NO ☐ NI

BB. facility monitoring equipment

☐ YES ☐ NO ☐ NI

iii. name, address, and phone number of person or office to contact during post-closure care period?

☐ YES ☐ NO ☐ NI

c. Has the post-closure period begun?

☐ YES ☐ NO ☐ NI

d. Is the written post-closure cost estimate available? 265.144

☐ YES ☐ NO ☐ NI

Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Shed</u>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Lab packs only</u>

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<i>2 in past year. 12-28-82 5-5-83</i>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.				<i>Last shipment has been ~40 days. Will check.</i>
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				<i>None</i>

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>			
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>			
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?				N.A. -
b. Have more than 90 days elapsed since the date inspected in (a)?				Storage Facility
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>			
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

SEP 17 1982

5HW-TUB

Mr. Ken Walker
824 North Street
Morenci, Michigan 49256

MID 057676124

Dear Mr. Walker:

As we discussed in telephone conversations on September 16, 1982, I am sending you a copy of the Compliance Order this agency issued to Occidental Chemical Corp., Parker Surface Treatment Products Division. The Order cites violations of hazardous waste management regulations under the Resource Conservation and Recovery Act.

Thank you for your concern in this matter. If you have any questions or wish to discuss the Order further, please contact me at (312) 886-7482.

Sincerely,

Sally K. Swanson
Environmental Protection Specialist

Enclosure

cc: Alan J. Howard, Chief
Office of Hazardous Waste Management
Michigan Department of Natural Resources

bcc: Gade, ORC

S.Swanson:rita:5HW-TUB:6-7444:9-17-82

PARKER DELTA

HOOKER CHEMICALS & PLASTICS CORP. • 32100 Stephenson Highway, Madison Heights, MI 48071 • Tel. (313) 583-9300

July 12, 1982

RECEIVED

JUL 14 1982

RECEIVED
RESOURCE RECOVERY
S.E. MICHIGAN REGION
DIVISION OFFICE JUL 16 1982

ACT 64

Mr. Larry AuBuchon
 Department of Natural Resources
 Resource Recovery Division
 Southeast Michigan Region
 State Fairgrounds
 1120 W. State Fair Ave.
 Detroit, MI 48203

Dear Mr. AuBuchon:

The items referred to in your RCRA Inspection Report, which was based on your RCAA inspection of our facility on June 15, 1982, have all been acted upon, or corrected.

The corrections are as follows:

1. Name change - A form letter indicating our facility name change has been sent to the U.S. EPA, Region V, Chicago, IL.
2. Section B, Question 3.c - The additional signs for the shed have been ordered and will be posted as soon as they are received.
3. Section B, Question 4.d - We will comply by conducting weekly inspections of all waste storage areas.
4. Section B, Question 4.f - The inspection log now contains notations on observations made concerning stored waste and the appropriate actions taken.
5. Section B, Question 5.g - The personnel involved with waste management and handling will be given an annual review of the program and will sign-off in the RCRA manual by July 30, 1982.
6. Section D, Question 1.a - The Contingency Plan chain-of-command has been clarified so that it includes the SPCC Coordinator.
7. Section D, Question 1.b - Local Fire and Police Departments have been notified by sending them copies of our Contingency Plan which includes: Coordinators, evacuation plan, coordinators responsibilities, emergency equipment, spill control equipment and communications available and its location in the facility.
8. Section D, Question 1.d - A list of all emergency equipment available and its location is included in the Contingency Plan.
9. Section D, Question 2. - Same as item 7 above.

(continued)

PARKER

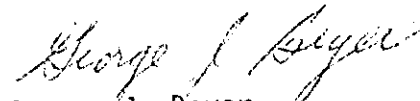
page 2

10. Section E, Question 3.b.ü. - A list indicating the location and quantity of all hazardous waste drums is now available in the RCRA manual.
11. Section G, Question 1.b.ü. - The maximum hazardous waste inventory is listed in the RCRA manual as 195 Drums.
12. Section G, Question 1.b.iv. - The sequence of closure activities is now outlined in the RCRA manual.

If further clarification is necessary, please contact me.

Very truly yours,

OCCIDENTAL CHEMICAL CORPORATION
PARKER Surface Treatment Products



George J. Beyer
Technical Support Manager

GJB/mz

EPA

NATURAL RESOURCES COMMISSION

JACOB A. HOFFER
CARL T. JOHNSON
E. M. LAITALA
V. P. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

June 17, 1982

RESOURCE RECOVERY COMMISSION

THOMAS J. BLESSING, JR.
ALBERT M. BORKIN
ANN ESKEBIDGE
PAMELA A. FRUCCI
C. ERNEST KEMP
JOHN W. LAYMAN
CLIFFORD MILES
STUART B. PADNOS
ROGER RASMUSSEN
JAMES STORNANT
MICHAEL L. WALKINGTON

George Beyer, Technical Support Mgr.
Occidental Chemical Corp.
Parker Surface Treatment Products
32100 Stephenson Hwy.
Royal Oak, MI 48071

RESOURCE RECOVERY DIVISION

SE MICHIGAN REGION
STATE FAIRGROUNDS
1120 W. STATE FAIR AVE.
DETROIT, MI 48203

313/368-3335

EPA ID # MID057676124

Dear Mr. Beyer:

On June 15, 1982, I conducted an investigation of your facility at 32100 Stephenson Hwy., Madison Heights, MI to evaluate compliance of the facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

Enclosed is a copy of the inspection report. I feel that your facility is substantially in compliance with the requirements, however, there are a few minor points which still need to be addressed and/or clarified. Please refer to the inspection report and the remarks section and, as appropriate, address the alterations.

You are requested to respond to this letter by July 16, 1982 providing information regarding those actions to correct these identified points. Please address your response to the address in the upper right corner of this letter.

If you have any questions regarding this matter, please feel free to contact me at (313) 368-3335.

Sincerely,
RESOURCE RECOVERY DIVISION



Larry AuBuchon
SOUTHEAST MICHIGAN REGION

LA:pf

cc: Al Howard, OHWM
EPA

RECEIVED

JUN 21 1982

ACT 64



RCRA Inspection Report

Identification Number: MI T D 0 5 7 6 7 1 1 2 4

Installation Name: Parker Div Cxy Metal Industries Corp.

Location Address: 32100 Stephenson Highway

City: Warren Heights State: MI

Date of inspection: 6/15/82 Time of inspection (from) 0930 (to) 1100

Person(s) interviewed	Title	Telephone
<u>George Beyer</u>	<u>Tech Support Mgr.</u>	<u>(313) 583-9300</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>Larry A. Buchan</u>	<u>MDNR-RRD / Water Quality Spec</u>	<u>(313) 368-3335</u>
_____	_____	_____

Installation Activity (mark only one box)

Inspection Form(s)

- | | |
|---|------|
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

RECEIVED

JUN 21 1982

ACT 64

As of June 1, 1982 facility has name change.
 New name: Occidental Chemical Corporation -
Parker Surface Treatment Products

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

None

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding:				
a. Receipt of hazardous waste from a foreign source?	___	___	___	N/A
b. Facility expansion?	___	___	___	C/A
c. Change of owner or operator?	___	___	___	N/A
2. General Waste Analysis:				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	___	___	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	___	___	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	___	___	N/A
3. Security - Do security measures include: (if applicable)				
a. 24-Hour surveillance?	___	___	___	N/A
or				
b. i. Artificial or natural barrier around facility?	___	___	___	N/A
and				
ii. Controlled entry?	<u>X</u>	___	___	
c. Danger sign(s) at entrance?	<u>X</u>	___	___	Place additional sign at 2nd entrance with no smoking sign. (Storage Area) (Feb)
4. Owner or operator inspections:				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	___	___	

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<u>X</u>			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				<u>N/A</u>
ii. safety and emergency equipment?				<u>N/A</u>
iii. security devices?	<u>X</u>			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?				<u>N/A</u>
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>X</u>			<u>weekly</u>
d. Are areas subject to spills inspected daily when in use?	<u>X</u>			<u>check area only once weekly</u>
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>X</u>			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<u>X</u>			
ii. the name of the inspector?	<u>X</u>			
iii. a notation of the observations made?	<u>X</u>			<u>indicate observation</u>
iv. the date and nature of any repairs or remedial actions?	<u>X</u>			
5. Do personnel training records include:				
a. Job titles?	<u>X</u>			
b. Job descriptions?	<u>X</u>			

	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	_____
d. Records of training?	<u>X</u>	—	—	_____
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	—	—	_____
f. Do new personnel receive required training within six months?	<u>X</u>	—	—	_____
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	<u>X</u>	—	<i>Personnel have annual review of page.</i>
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
a. Special handling?	<u>X</u>	—	—	_____
b. No smoking signs?	<u>X</u>	—	—	<i>Insure adequate "no smoking" signs are posted.</i>
c. Separation and protection from ignition sources?	<u>X</u>	—	—	_____

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: -

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

YES	NO	NI	Remarks
-----	----	----	---------

2. If required, does the facility have the following equipment:

a. Internal communications or alarm systems?

X

b. Telephone or 2-way radios at the scene of operations?

X

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X

Back home at my home
back home at my home
home at 22
No need identified for sign
installation

Indicate the volume of water and/or foam available for fire control:

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X

b. Is emergency equipment maintained in operable condition?

X

4. Has owner or operator provided immediate access to internal alarms? (if needed)

X

5. Is there adequate aisle space for unobstructed movement?

X

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

X

YES NO NI Remarks

Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X — —

Clarify division of concern

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X — —

Plan is met on file at the agencies. Arrangements on informed basis established

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— — X

Insurance list is available

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — —

2. Are copies of the Contingency Plan available at the site and local emergency organizations?

X — —

Plan was just developed will disseminate to site locations & emergency organizations

YES NO NI Remarks

Emergency Coordinator

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

<u>X</u>	___	___	_____
<u>X</u>	___	___	_____
<u>X</u>	___	___	_____

4. Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

___	___	___	<u>No emergency occurred</u>
-----	-----	-----	------------------------------

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
1. Use of Manifest System				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	_____	_____	_____	N/A
b. Are records of past shipments retained for 3 years?	_____	_____	_____	N/A
* 2. Does the owner or operator meet requirements regarding manifest discrepancies?				
	_____	_____	_____	N/A
Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record				
a. Does the owner or operator maintain an operating record as required in 265.73?	X	_____	_____	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X	_____	_____	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	X	X*	_____	* indicate location & quantity of hazardous waste within the facility - mainly prior to placement in shed.
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X

- v. Reports detailing all incidents that required implementation of the Contingency Plan?

N/A

- vi. All closure and post closure costs as applicable?

X

4. Availability of Records

Are all facility records required under 40 CFR Part 265 available for inspection?

X

5.**Unmanifested Waste Reports

- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

N/A

- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure				
a. Is the facility closure plan available for inspection?	<u>X</u>	—	—	
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	—	—	—	<u>N/A</u>
ii. maximum hazardous waste inventory?	—	<u>Y</u>	—	<u>List max. inventory</u>
iii. estimated year of closure?	—	—	—	<u>N/A</u>
iv. schedule of closure activities?	—	<u>Y</u>	—	<u>Sequence of closure</u>
c. Has closure begun?	—	<u>Y</u>	—	<u>N/A</u>
d. <u>Is written closure cost estimate available</u>	<u>X</u>	—	—	
*2. Post-Closure				
a. Is the post-closure plan available for inspection?	—	—	—	<u>N/A</u>
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	—	—	—	
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	—	—	—	
BB. facility monitoring equipment	—	—	—	
iii. name, address, and phone number of person or office to contact during post-closure care period?	—	—	—	
c. Has the post-closure period begun?	—	—	—	
d. Is the written post-closure cost estimate available?	—	—	—	

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Pa 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition?	<u>X</u>	___	___	_____
2. Are containers compatible with waste in them?	<u>X</u>	___	___	_____
3. Are containers managed to prevent leaks?	<u>X</u>	___	___	_____
4. Are containers stored closed?	<u>X</u>	___	___	_____
5. Are containers inspected weekly for leaks and defects.	<u>X</u>	___	___	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<u>X</u>	___	___	_____
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply).	<u>X</u>	___	___	_____
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>X</u>	___	___	_____

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review?	<u>X</u>	___	___	___
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>0</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).				
a. Manifest document number?	<u>X</u>	___	___	___
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>	___	___	___
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>	___	___	___
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>	___	___	___
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	___	___	___
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	___	___	___
g. Required certification?	<u>X</u>	___	___	___
h. Required signatures?	<u>X</u>	___	___	___
(4) Reportable exceptions				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Placed in container
3. If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations:				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

PARKER DIVISION

OXY METAL INDUSTRIES CORPORATION • 32100 Stephenson Highway, Madison Heights, Michigan 48071 • Tel. (313) 583-9300

June 4, 1981

Mr. Ralph Feeney
U.S. Environmental Protection Agency
Region 5
Water and Hazardous Materials Compliance Section
230 South Dearborn Street
Chicago, Illinois 60604

Re: EPA I.D. No. MID057676124
RCRA Inspection

Dear Mr. Feeney:

Per our phone conversation on May 27, 1981 concerning the RCRA Inspection conducted at our facility on March 11, 1981 by the Michigan DNR, I am writing to confirm our correction of the seven minor violations cited.

Citation 1. No mixed lab waste analysis plan

No analysis plan was available at the time of the inspection because no mixed lab waste had been disposed of at that time. Mixed lab waste consists of obsolete raw chemicals and small quantity of lab mixtures. These wastes are segregated by class and hazard, itemized and placed in DOT 55 gallon drums with the appropriate labels for storage until disposal.

Citation 2. "Danger" signs not posted

At the time of the inspection the signs were on order. The signs have been received and are posted on the exterior entrance to the main facility and on the door of the storage shed.

Citation 3. Training Records

Complete training records including job titles, training description and record of training were prepared and available prior to May 19, 1981.

Citation 4. "No Smoking" signs

At the time of the inspection these signs were on order. The signs have been received and are posted in the storage areas.



Mr. Ralph Feeney
Page 2
June 4, 1981

Citation 5. Contingency Plan

An updated Contingency Plan and Emergency Procedures Manual is now available which indicates emergency coordinators, a list and location of emergency equipment and other items as specified in Subpart D.

Citation 6. Waste Drum Inspection

A hazardous waste inspection log is now being maintained. Storage areas and drums are inspected weekly for deteriorations, corrosion, leaking or bulging drums, compatibility of wastes, aisle space and any other function considered detrimental to a safe operation.

Citation 7. Placards

Placards for the transporter are available if required and we will verify proper truck placarding prior to the transporting of hazardous waste.

During our conversation you indicated the violations are minor and no further action is expected provided they are corrected. If there are any questions which I have not adequately answered, please notify me. It is hoped that this information will be sufficient to close out our file on this inspection.

Very truly yours,

PARKER DIVISION
HOOKER CHEMICALS & PLASTICS CORPORATION



George J. Beyer
Technical Support Manager

GJB/so

RECEIVED
JUN 1 1981
ENFORCEMENT DIVISION
EPA-REGION V

PARKER DIVISION

OXY METAL INDUSTRIES CORPORATION • 32100 Stephenson Highway, Madison Heights, Michigan 48071 • Tel. (313) 583-9300

April 30, 1981

U.S. Environmental Protection Agency
Region V
RCRA Permits Branch
230 South Dearborn Street
Chicago, IL 60604

RECEIVED
MAY - 4 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Re: EPA I.D. No. MID057676124

Dear Sirs:

In compliance with our requirements under RCRA, our facility submitted to your office before November 20, 1980 a RCRA Part A permit application which authorizes us to operate hazardous waste storage and treatment facilities under Interim Status regulations.

In the Federal Register of November 17, 1980 (45 FR 76074 et seq.) the EPA promulgated amendments that suspend the applicability of the RCRA hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of certain wastewater treatment and neutralization units. We believe that the promulgated amendments of November 17, 1980 suspend the applicability of the above RCRA hazardous waste regulations to our wastewater facility. We desire to have our Part A permit application amended to reflect the fact that as a consequence of the November 17, 1980 amendments we will only require a RCRA permit for hazardous waste storage.

Our rationale for the above belief is as follows:

The only hazardous waste treatment we conduct is the treatment of wastewaters in tanks associated with a system whose effluent water discharges to a POTW, and is subject to regulation under the pre-treatment requirements, (i.e. 307 (b)) of the Clean Water Act.

We would appreciate guidance from the Agency regarding the procedure we must follow to effect the subject amendment to our RCRA Part A permit application. If amended Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3) submissions will be required, we would appreciate the mailing of the subject blank forms to us.

We would also like to notify you of the merger on January 1, 1981 of Oxy Metal Industries Corporation into Hooker Chemicals & Plastics Corp. We are now The Parker Division, Hooker Chemicals & Plastics Corp.

Very truly yours,

George J. Beyer

George J. Beyer
Facility-Environmental Compliance Officer

GJB/so

OMI

MAY 10 4 1981

034

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards
122.7(i)

I. General Information:
(265.74)

(A) Facility Name: PARKER DIVISION - OXY METAL INDUSTRIES CORP.

(B) Street: 32100 STEPHENSON HWY.

(C) City: MADISON HTS. (D) State: MICHIGAN (E) Zip Code: 48071

(F) Phone: 313 583-9300 (G) County: OAKLAND

(H) Operator: PARKER DIVISION

(I) Street: 32100 STEPHENSON HWY.

(J) City: MADISON HEIGHTS (K) State: MICHIGAN (L) Zip Code: 48071

(M) Phone: 313-583-9300 (N) County: OAKLAND

(O) Owner: AS OF JAN 1, 1981, NOOKER CHEMICAL AND PLASTICS

(P) Street: 32100 STEPHENSON HWY.

(Q) City: MADISON HEIGHTS (R) State: MICHIGAN (S) Zip Code: 48071

(T) Phone: 313-583-9300 (U) County: OAKLAND

(V) Type of Ownership: Federal Municipal X Private

 State County

(W) Date of Inspection: MARCH 11, 1981 (Q) Time of Inspection (From) 9:45 A.M. (To) 1:00 P.M.

(X) Weather Conditions: OVERCAST, NORTHERLY WINDS, COLD

(Y) Person(s) Interviewed

Title

Telephone

MR. GEORGE BEYER

TECHNICAL SUPPORT MANAGER

313-583-9300

MR. ARTHUR KLIEGEL

COMPANY LEGAL COUNSEL

313-583-9300

(Z) Inspection Participants

Title

Telephone

KEVIN TOLLIVER

ENGINEER - AIR QUALITY DIVISION

313-666-2700

SUSAN NORTON

WATER QUALITY SPECIALIST - WATER
QUALITY DIVISION

313-379-9692

II. Description of Site Activity

(A) X Generator (Form 2)

(B) _____ Transporter (Form 3)

(C) X Chemical, Physical
and Biological Treatment (Form 4)

(D) X Storage (Form 5)

(E) X Landfill (Form 6)

(F) _____ Incineration (Form 7)

(G) _____ Land Treatment (Form 4)

(H) _____ Thermal Treatment (Form 7)

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

Yes

No

Not
Inspected

See Remark
Number

(J) Has this facility
Submitted a Part A
Permit Application?

X

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source? 265.12(a) <i>NOT APPLICABLE</i>				
2. Transfer of Ownership? 265.12(b)		X		
(B) General Waste Analysis:				
1. Has the owner ^{or} operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	<i>FOR FILTER PRESS SLUDGE</i> X	<i>FOR MIXED LAB WASTE</i> X		
2. Does the owner ^{or} operator have a detailed waste analysis plan on file at the facility? 265.13(b)	<i>FOR FILTER PRESS SLUDGE</i> X	X		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c) <i>NOT APPLICABLE</i>				
(C) Security - Do security measures include: 265.14				
1. 24-Hour Surveillance? 265.14(b)1	X			
2. Artificial or Natural Barrier Around Facility? 265.14(b)2	X			
3. Controlled Entry? 265.14(b)2ii	X			
4. Danger Sign(s) at Entrance? 265.14(c)	X		<i>SIGNS ARE ON ORDER - AWAITING DELIVERY</i> X	
(D) Do Owner ^{or} Operator Inspections Include: 265.15				
1. Records of Malfunctions? 265.15(a)1	X			
2. Records of Operator Error? 265.15(a)1	X			
3. Records of Discharges? 265.15(a)1	X			
4. Inspection Schedule? 265.15(a)4	X			
5. Safety, Emergency Equipment? 265.15(b)1	X			
6. Security Devices? 265.15(b)1	X			
7. Operating and Structural Devices? <i>NOT APPLICABLE</i> 265.15(b)1				
8. Inspection Log? 265.15(d)	X			

III. GENERAL FACILITY STANDARDS - CONTINUED

Yes

No

Not Inspected

See Remark Number

Do Personnel Training Records

Include:

265.16(d)

1. Job Titles?

 X

2. Description of Training?

 X

3. Records of Training?

 X

Is Personnel Training Completed within the Required Time Frame?

X
~~NOT AVAILABLE~~

(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?

265.17

1. Special Handling?

X
ON INSIDE ON ORDER FOR SHED

2. No Smoking Signs?

X X

3. Separation and Confinement?

X

IV. PREPAREDNESS AND PREVENTION - 265 Subpart C

(A) Maintenance and Operation of Facility:

1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?

 X

265.31

(B) Does the Facility have the Following Equipment:

1. Alarm System?

X

265.32(a)

2. Telephone or 2-Way Radios?

X

265.32(b)

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X

265.32(c)

Indicate the volume of water and/or foam available for fire control;

265.32(d)

Units: OVERHEAD SPRINKLER SYSTEM

CITY FIRE HYDRANT IN FRONT OF PREMISES

	Yes	No	Not Inspected	See Remark Number
(C) Testing and Maintenance of Emergency Equipment: 265.33 Recordkeeping required under 265.15(b)1				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Is Emergency Equipment Maintained in Operable Conditions?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(D) Has Owner ^{or} Operator Provided Immediate Access to Internal Alarms (if needed)? 265.34	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(E) Is there Adequate Aisle Space For Unobstructed Movement? 265.35	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(F) Are Arrangements with Local Authorities Included in the Operating Record? 265.37	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

3-4 FEET - WIDTH OF AISLES

V . CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart D

Does the Contingency Plan Contain the Following Information:

CONTINGENCY PLAN WAS IN PROGRESS OF BEING UPDATED ON MAR 11, 1981; SHOULD BE READY BY END OF MARCH 1981.

1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)
2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

X

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? 265.52(d)		<i>WILL BE ADDED TO UPDATED CONTINGENCY PLAN</i> X		
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 265.52(e)	<i>HAVE LOG OF LOCATION OF FIRE EXTINGUISHERS, FIRE BLANKETS, ETC.</i> X	X		
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes:) 265.52(f)	X			
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations? 265.53		<i>PLAN BEING UPDATED</i> X		
(C) Emergency Coordinator 265.55				
1. Is the facility Emergency Coordinator identified?	X			
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?		<i>NOT APPLICABLE</i> X		

VI . MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING -265 Subpart E

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Are records of past shipments retained for 3 years? <i>NOT APPLICABLE</i> 265.71(5)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies? <i>NOT APPLICABLE</i> 265.72	<u> </u>	<u> </u>	<u> </u>	<u> </u>
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

VII . CLOSURE AND POST CLOSURE - 265 Subpart G and H

(A) Closure and Post Closure	<i>NOT APPLICABLE</i>			
1. Closure Plan Available for Inspection by May 19, 1981? 265.112(a)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
2. Has this plan been submitted to the Regional Administrator? 265.112(c)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3. Has Closure begun? 265.112(c)	<u> </u>	<u> </u>	<u> </u>	<u> </u>
4. Is closure cost estimate available by May 19, 1981? 265.142	<u> </u>	<u> </u>	<u> </u>	<u> </u>
(B) Post Closure Care and Use of Property - Has the Owner ^{or} Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
265.117				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection
262

I. General Information:

(A) Installation Name: PARKER DIVISION - OXY METAL INDUSTRIES CORP.
(B) Street: 32100 STEPHENSON HWY.
(C) City: MADISON HEIGHTS (D) State: MICHIGAN (E) Zip Code: 48071
(F) Phone: 313 583 9300 (G) County: OAKLAND
(H) Operator: PARKER DIVISION
(I) Street: 32100 STEPHENSON HWY.
(J) City: MADISON HEIGHTS (K) State: MICHIGAN (L) Zip Code: 48071
(M) Phone: 313 583 9300 (N) County: OAKLAND
(O) Owner: AS OF JAN 1, 1981, NOOKER CHEMICAL & PLASTICS
(P) Street: 32100 STEPHENSON HWY.
(Q) City: MADISON HEIGHTS (R) State: MICHIGAN (S) Zip Code: 48071
(T) Phone: 313 583 9300 (U) County: OAKLAND
(V) Type of Ownership: ☐ Federal ☐ Municipal ☒ Private
☐ State ☐ County
(W) Date of Inspection: _____ Time of Inspection (From) 9:45 AM (To) 1:00 P.M.
(X) Weather Conditions: OVERCAST NORTHERLY WINDS, COLD.

(Y) Person(s) Interviewed	Title	Telephone
<u>MR. GEORGE BEYER</u>	<u>TECHNICAL SUPPORT MANAGER</u>	<u>313-583-9200</u>
<u>MR. ARTHUR KLUEGEL</u>	<u>COMPANY LEGAL COUNSEL</u>	<u>313-583-9300</u>
_____	_____	_____

(Z) Inspection Participants	Title	Telephone
<u>KEVIN TOLLIVER</u>	<u>ENGINEER, AIR QUALITY DIVISION</u>	<u>313-666-2900</u>
<u>SUSAN NORTON</u>	<u>WATER QUALITY SPECIALIST WATER QUALITY DIVISION</u>	<u>313-379-9692</u>
_____	_____	_____

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

- | | |
|---------------------------------|---|
| (A) _____ Transporter (Form 3) | (B) <u>X</u> Chemical, Physical and Biological Treatment (Form 4) |
| (C) <u>X</u> Storage (Form 5) | (D) _____ Landfill (Form 6) |
| (E) _____ Incineration (Form 7) | (F) _____ Thermal Treatment (Form 7) |
| (G) Comments: _____ | |
| _____ | |
| _____ | |
| _____ | |

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available? 262.23(a)3	<u>X</u>			
(B) Does the Manifest contain the following information:				
1. Manifest document number? 262.21(a)1	<u>X</u>			
2. Name, mailing address, telephone number, and EPA ID Number of Generator? 262.21(a)2			N/A	
3. Name and EPA ID Number of Transporter(s)? 262.21(a)3			N/A	
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility? 262.21(a)4			N/A	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? 262.21(a)5 DOT information in CFR 49 172.101, 172.202 and 172.203			N/A	
6. The total quantity of waste(s) and the type and number of containers loaded? 262.21(a)6			N/A	
7. Required Certification? 262.21(b)			N/A	
8. Required Signatures? 262.23(a)1				
(C) Does the Owner or Operator Submit Exception Reports when Needed? 262.42			N/A	

FORMS HAVE NOT BEEN NEEDED YET
BUT HAVE BEEN ARRANGED TO RECOMMEND
REQUIRED INFORMATION ACCURATELY.

REPORT FORMS PREPARED
BUT HAVE NOT YET BEEN NEEDED.

IV. PRE-TRANSPORT REQUIREMENTS - 262 Subpart C

(A) Is Generator Packaging waste in accordance with DOT Regulations? 262.30 49 CFR Parts 173.178 and 179	DOES NOT APPLY			
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? 262.31 49 CFR Part 172	DOES NOT APPLY			
(C) If required, are placards available to transporter? 262.33 49 CFR Part 172 Subpart F	NOT REQUIRED AS OF YET	<u>X</u>		

Yes

No

Not
InspectedSee Remark
Number

(D) Pre-shipment Accumulation:

1. Are containers marked with start of accumulation date? _____ X _____
- 262.34(a)3
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days? _____ X _____
- 262.34(a)1 If no, the facility must be storage or disposal facility 262.34(b)
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? _____ COMPLIES W/ 50' LIMIT X _____ WEEKLY INSPECTIONS NOT YET BEGUN X _____
4. Are wastes stored in tanks managed according to the following: NOT APPLICABLE
- a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? NOT APPLICABLE _____
- 265.192(b)
- b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? _____
- 265.192(c)
- c. Do continuous feed systems have a waste-feed cutoff? _____
- 265.192(d)
- d. Are required daily and weekly inspections done? _____
- 265.194
- e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements? _____
- 265.198, 265.17
- f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply) _____
- 265.199

If generator is also a MSD, omit section V

NOT APPLICABLE

	Yes	No	Not Inspected	See Remark Number
A. Do Personnel training records include: 265.16				
1. Job Titles? 265.16(d)1				
2. Description of Training? 265.16(d)3				
3. Records of Training? 265.16(d)4				
Is Personnel Training Completed within the Required Time Frame?				
B. Preparedness and Prevention 265 Subpart C				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31				
2. Does the Facility have the following equipment?				
a. Alarm system? 265.32(a)				
b. Telephone or 2-Way Radios? 265.32(b)				
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)				
Indicate the volume of water and/or foam available for fire control 265.32(d)				
Units: _____				
3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment? 265.33				
b. Is emergency equipment Maintained in Operable Condition? 265.33				

4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?
265.34(a)
5. Is there adequate Aisle Space for unobstructed Movement?
265.35
6. Are arrangements with local authorities included in the operating record?
265.37

(C) Contingency Plan and Emergency Procedure

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.
265.52(d)

d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?
265.52(e)

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.
265.52(f)

	Yes	No	Not Inspected	See Remark Number
<i>NOT APPLICABLE</i>				
2. Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53	_____	_____	_____	_____
3. Emergency Coordinator 265.55				
a. Is the Facility Emergency Coordinator Identified?	_____	_____	_____	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	_____	_____	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	_____	_____	_____	_____

VI. RECORDKEEPING

- (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years? *NOT APPLICABLE*
265.71(a)5

VII. INTERNATIONAL SHIPMENTS

- (A) Has the Installation Imported or Exported Hazardous Waste?
262.50

_____ x _____

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, *NOT APPLICABLE*
has a generator:
- a. Notified the Administrator in writing?
262.50(b)1
- b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

NOT APPLICABLE

Yes

No

Not
Inspected

See Remark
Number

c. Met the Manifest requirements?
262.50(b)3

2. Importing Hazardous Waste,
has the generator:
262.50(d)

a. Met the manifest requirements?

VIII. PREPARER INFORMATION

Name: SUSAN NORTON, WATER QUALITY SPECIALIST, WATER QUALITY DIVISION - 313-379-969

Title: KEVIN TOLLIVER, ENGINEER, AIR QUALITY DIVISION - 313 666 7300

Phone Number: _____

REMARKS: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 3 - Transporter Inspection
(263)

NOT APPLICABLE

I. General Information:

(A) Transporter Name: _____

(B) Street: _____

(C) City: _____ (D) State: _____ (E) Zip Code: _____

(F) Phone: _____ (G) County: _____

(H) Operator: _____

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: _____

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

(V) Type of Ownership: _____ Federal _____ Municipal _____ Private
_____ State _____ County

(W) Date of Inspection: _____ Time of Inspection (From) _____ (To) _____

(X) Weather Conditions: _____

NOT APPLICABLE

(Y) Person(s) Interviewed

Title

Telephone

(Z) Inspection Participants

Title

Telephone

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) _____ Generator (Form 2)

(B) _____ Chemical, Physical and
Biological Treatment (Form 4)

(C) _____ Storage (Form 5)

(D) _____ Landfill (Form 6)

(E) _____ Incineration (Form 7)

(F) _____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. RECORDKEEPING

Yes

No

Not
Inspected

See Remark
Number

(A) Are Copies of the Completed
Manifest(s) or Shipping Paper(s)
Available for Review and
Retained for Three Years?

263.22(a)

NOT A/CABLE

Yes

No

Not
InspectedSee Remark
Number

A. Does the Transporter Record on the
Manifest the Date the Waste left U.S.? ^{^the}
263.20(f)1 _____

B. Are Completed Manifest(s) on File? —

SIGNED

263.22(a) and 263.20(f)2

V. MISCELLANEOUS

A. Does Transporter Transport
Hazardous Waste Into the
U.S. from Abroad?
263.10(c)1 _____

B. Does the Transporter Mix
Hazardous Waste of Different
DOT Shipping Descriptions
by Placing them into a Single
Container?

263.10(c)2

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and
Must comply with the Generator Regulations.

263.10(c)

VI. PREPARER INFORMATION

A. Name: _____

Title: _____

Phone No.: _____

Remarks: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment
265 - Subpart Q

I. General Information

(A) Facility Name: PARKER DIVISION - OXY METAL INDUSTRIES CORP.
(B) Street: 32100 STEPHENSON HWY.
(C) City: MADISON HEIGHTS (D) State: MICHIGAN (E) Zip Code 48071
(F) Phone: 313-583-9300 (G) County: OAKLAND

II. Chemical, Physical and Biological Treatment (Subpart Q)

ONLY LABORATORY WASTEWATER
IS TREATED BEFORE DISCHARGE TO
SANITARY SEWER

265

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401(b)	X			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? 265.401(c)	X			
3. Has the owner or operator addressed the waste analysis requirements of 265.402? and 265.13			NOT APPLICABLE	
4. Are inspection procedures followed according to 265.403?	X			
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	X		NOT APPLICABLE	NO REACTIVE OR IGNITABLE WASTE
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		X		PUT IN SYSTEM.

III. Land Treatment (Subpart M) 265

NOT APPLICABLE

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation? 265.272(a)				
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? 265.272(b&c)				
3. Is waste analysis according to 265.273? and 265.13				
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278(a)				
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278(b and c)?				
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility? 265.279				
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? 265.281				
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.) 265.282				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

265 - Subparts I, J, K, and L

I. General Information

(A) Facility Name: PARKER DIVISION, OXY METALS INDUSTRIES CORP.
(B) Street: 32100 STEPHENSON HWY.
(C) City: MADISON HEIGHTS (D) State: MICHIGAN (E) ZIP Code: 48071
(F) Date of Inspection: 3-13-83-9800

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I) 265

	YES	NO	NOT IN- SPECTED	REMARK
1. Are containers in good condition? 265.171	X			
2. Are containers compatible with waste in them? 265.172	X			
3. Are containers stored closed? 265.173(a)	X			
4. Are containers managed to prevent leaks? 265.173(b)	X			
5. Are containers inspected weekly for leaks and defects? 265.174	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? 265.176	X			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.177(a)	X			
8. Are containers of incompatible wastes separated or protected from each other <u>physical barriers</u> or sufficient distance? 265.177(c)	X	X	NOT APPLICABLE	

B. Facilities which store hazardous waste in tanks (Subpart J) NOT APPLICABLE

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192(b)				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 265.192(c)				

	YES	NO	NOT IN-SPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff? 265.192(d)				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193(a)				
5. Are required daily and weekly inspections done? 265.194				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.199				

NOT APPLICABLE				
C. Facilities which store hazardous waste in surface impoundments (Subpart K) 265				
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222				
2. Do earthen dikes have protective cover? 265.223				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225(a)				
4. Is the freeboard level inspected at least daily? 265.226(a)1				
5. Are the dikes inspected weekly for evidence of leaks or deterioration? 265.226(a)2				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.299(a)1				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				

NOT APPLICABLE				
D. Facilities which store hazardous waste in waste piles (Subpart L) 265				
1. Are waste piles covered or protected from the wind? 265.251				
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.) 265.253				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256(a)1				

Continued on next page

NOT APPLICABLE

	YES	NO	NOT INSPECTED	REMARK #
5. Are piles of reactive or ignitable waste protected? 265.256(a)2				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257(a)				
7. Are piles of incompatible waste protected by barriers or distance from other waste? 265.257(b)				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N
NOT APPLICABLE

I. General Information

(A) Facility Name: _____
(B) Street: _____
(C) City: _____ (D) State: _____ (E) Zip Code: _____
(F) Date of Inspection: _____

<u>II. Landfills</u>		Yes	No	Not Inspected	See Remark Number
(A) General Operating Requirements - Does the facility provide the following:					
*1. Diversion of run-on away from active portions of the fill? 265.302(a)		_____	_____	_____	_____
*2. Collection of run-off from active portions of the fill? 265.302(b)		_____	_____	_____	_____
*3. Is collected run-off treated? 265.302(b)		_____	_____	_____	_____
4. Control of wind disposal of hazardous waste? 265.302(d)		_____	_____	_____	_____

(* Effective 11-19-81)

(B) Surveying and Recordkeeping -
Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell? 265.309(a) _____
2. The contents of each cell and the location of each hazardous waste type within each cell? 265.309(b) _____

Yes

No

Not
InspectedSee Remark
Number

NOT APPLICABLE

C. Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81?
265.112(a)
2. Has this plan been submitted to the Regional Administrator?
265.112(c)
3. Has Closure begun?
265.112(c)
4. Is Closure cost estimate available by 5-19-81?
265.142(a)

D. Special requirements for ignitable or reactive waste

Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? 265.312

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

E. Special requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?
265.313

If not, the provisions of 40 CFR 265.17(b) apply.

F. Special Requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?
265.314(a)
2. Does the landfill have a chemically and physically resistant liner system?
265.314(a)1

T APPLICABLE

	Yes	No	Not Inspected	See Remark Number
3. Does the landfill have a functional leachate collection system? 265.314(a)1	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill? 265.314(a)2	_____	_____	_____	_____
G. Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? 265.315(a)	_____	_____	_____	_____

11/6/80

265.11

- FORM 7

RCRA INSPECTION REPORT-INTERIM STATUS STANDARDS
 SUPPLEMENTAL FORM FOR THERMAL TREATMENT (AND INCINERATORS)
 265 - Subparts P and O

NOT APPLICABLE

I. General Information

(A) Facility Name: _____
 (B) Street: _____
 (C) City: _____ (D) State: _____ (E) Zip Code: _____
 (F) Date of Inspection: _____

II. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition: I 265.343 Th 265.373

**** Was this component at SS prior to adding waste?

Component	Yes	No	Not Inspected	See Remark #:
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

III. Waste Analysis

265.13

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:	I 265.345	TH 265.375	Yes	No	Not Inspected	See Remark #:
a. Heating value			_____	_____	_____	_____
b. Halogen content			_____	_____	_____	_____
c. Sulfur content			_____	_____	_____	_____

2. Documented, written data may be substituted for analysis for these. Are either present for:

Yes No Not Inspected See Remark #:

a. Lead? I 265.345 Th 265.375

b. Mercury?

B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

See Remark #:

1. _____
2. _____
3. _____
4. _____
5. _____

IV. Monitoring and Inspections

A. Combustion/emission control instruments monitored at least every 15 minutes?
I 265.347(a)1 Th 265.377(a)1

Yes No Not Insp. See Remark #:

B. Steady state maintained or corrections attempted?

I 265.347(a)1 Th 265.377(a)1

C. Stack plume observed at least hourly for normal color and opacity?

I 265.347(a)2 Th 265.377(a)2

D. Did any stack observations made by owner or operator show a plume different than normal?*

I 265.347(a)2 Th 265.377(a)2

E. If yes to D above, were corrections made to return emissions to normal appearance?*

I 265.347(a)2 Th 265.377(a)2

F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

I 265.347(a)3 Th 265.377(a)3

G. Emergency shutdown controls, system alarms checked daily for proper operation?

I 265.347(a)3 Th 265.377(a)3

Specify in Remarks for what period of time this was checked.

V. Open Burning *NOT APPLICABLE*

Only complete this part if the facility open burns hazardous waste.

- | | Yes | No | Not Inspected | See Remark #: |
|---|-------|-------|---------------|---------------|
| 1. Does this facility burn only waste explosives?
(A <u>No</u> answer means other hazardous waste is open-burned.) 265.382 | _____ | _____ | _____ | _____ |
| 2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)? 265.382 | _____ | _____ | _____ | _____ |

Inspector(s): Susan Norton, WATER QUALITY DIVISION, D. N. R. (Sign and Date)

Kevin L. Tolliver, AIR QUALITY MARCH 11, 1981
MARCH 11, 1981

265.382

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

034

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards
122.7(i)

I. General Information:
(265.74)

(A) Facility Name: PARKER DIVISION - Oak Park Landfill

(B) Street: 32100 STEPHENSON Hwy

(C) City: ROYAL OAK (D) State: MICHIGAN (E) Zip Code: 48071

(F) Phone: 583-9300 (G) County: CLAYLAND

(H) Operator: PARKER DIVISION

(I) Street: 32100 STEPHENSON Hwy.

(J) City: ROYAL OAK (K) State: MICHIGAN (L) Zip Code: 48071

(M) Phone: 583-7300 (N) County: OAKLAND

(O) Owner: HOOVER CHEMICAL AND PLASTICS

(P) Street: 32100 STEPHENSON Hwy

(Q) City: ROYAL OAK (R) State: MICHIGAN (S) Zip Code: 48071

(T) Phone: 583-9300 (U) County: OAKLAND

(V) Type of Ownership: ☐ Federal ☐ Municipal ☒ Private
☐ State ☐ County

(W) Date of Inspection: 03-11-81 (Q) Time of Inspection (From) 10:00 (To)

(X) Weather Conditions: OVERCAST, NORTH WINDS, CLOUDY

(Y) Person(s) Interviewed

Title

Telephone

GEORGE BEVER

TECHNICAL SUPPORT MGR.

583 1300

ARTHUR KLUEGEL

ATTORNEY

583 1300

(Z) Inspection Participants

Title

Telephone

KEVIN L. TOLLIVER

ENGINEER - ARD

(313) 666-2700

SUE NORTON

WATER QUAL SPEC - WRD

(313) 379-9692

II. Description of Site Activity

(A) ☒ Generator (Form 2)

(B) ☐ Transporter (Form 3)

(C) ☒ Chemical, Physical
and Biological Treatment (Form 4)

(D) ☒ Storage (Form 5)

(E) ☐ Landfill (Form 6)

(F) ☐ Incineration (Form 7)

(G) ☐ Land Treatment (Form 4)

(H) ☐ Thermal Treatment (Form 7)

(I) Comments: PAPER ONLY WASTE COMMENTS TWO WASTE STREAMS - 1) FIBER

FILTER PRESS SLUDGE AND 2) THICKENED LIQUID WASTE

THEY AREN'T A TREATING FACILITY IN THE STRICT SENSE - THEY TREAT

THESE LAB WASTES BEFORE DISCHARGING IT TO THE SEWER SYSTEM

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

Yes

No

Not
Inspected

See Remark
Number

(J) Has this facility
Submitted a Part A
Permit Application?

122.4

	Yes	No	Not Inspected	See Remarks Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source? 265.12(a)			NOT APPLICABLE	1
2. Transfer of Ownership? 265.12(b)		✓		
(B) General Waste Analysis:				
1. Has the owner ^{or} operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	FILTER PRESS SLUDGE YEAST X	MIXED LAB WASTE X		2
2. Does the owner ^{or} operator have a detailed waste analysis plan on file at the facility? 265.13(b)	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)			NOT APPLICABLE	3
(C) Security - Do security measures include: 265.14				
1. 24-Hour Surveillance? 265.14(b)1 ^{OR}	X	A.D.T. SYSTEM		
2. Artificial or Natural Barrier Around Facility? 265.14(b)2 ^{OR}	X			
3. Controlled Entry? 265.14(b)2ii	X			
4. Danger Sign(s) at Entrance? 265.14(c)		X	AWAITING DELIVERY.	4
(D) Do Owner ^{or} Operator Inspections Include: 265.15				
1. Records of Malfunctions? 265.15(a)1	X			
2. Records of Operator Error? 265.15(a)1	X			
3. Records of Discharges? 265.15(a)1	X			
4. Inspection Schedule? 265.15(a)4	X			
5. Safety, Emergency Equipment? 265.15(b)1	X			
6. Security Devices? 265.15(b)1	X			
7. Operating and Structural Devices? 265.15(b)1			NOT APPLICABLE	5
8. Inspection Log? 265.15(d)	X		THE FACILITY HAS A CONTROL PLAN AND DISCH. R.	

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include: 265.16(d)				
1. Job Titles?		X		
1a) Job Description				
2. Description of Training?		X		
3. Records of Training?		X		
Is Personnel Training Completed within the Required Time Frame?	X			
4. Written descrip of training reg'd for each job.				
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed? 265.17				
1. Special Handling?	X			
2. No Smoking Signs?	BUILDING INTERIOR X	ON ORDER FOR SIGNS X		6
3. Separation and Confinement?	X			

IV. PREPAREDNESS AND PREVENTION - 265 Subpart C

(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent? 265.31		X		
Does the Facility have the Following Equipment: 265.32				
1. Alarm System? 265.32(a)	X	FIRE SHED X		7
2. Telephone or 2-Way Radios? 265.32(b)	X	FIRE SHED X		8
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)	X			
Indicate the volume of water and/or foam available for fire control; 265.32(d)				
Units:	STANDARD FIRE HYDRANT IN FRONT OF FACILITY			
	OVERHEAD SPRINKLERS			

Yes	No	Not Inspected	See Report Number
-----	----	---------------	-------------------

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

265.52(d)

THIS INFORMATION WILL BE ON UPDATED PLANS

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

265.52(e)

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes:)

265.52(f)

(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?

265.53

COPIES AVAILABLE SOON

(C) Emergency Coordinator

265.55

1. Is the facility Emergency Coordinator identified?

2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

(D) Emergency Procedures

If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?

NOT APPLICABLE

9

Yes

No

Not
InspectedSee Remark
Number(C) Testing and Maintenance of
Emergency Equipment:

265.33 Recordkeeping required under 265.15(b)1

1. Has the Owner or Operator
established Testing and
Maintenance Procedures
for Emergency Equipment?

X

2. Is Emergency Equipment
Maintained in Operable
Conditions?

X

- (D) Has Owner ^{or} Operator Provided
Immediate Access to Internal
Alarms (if needed)?
265.34

X

- (E) Is there Adequate Aisle Space
for Unobstructed Movement?
265.35

X

3-4 FT WIDE AISLES

- (F) Are Arrangements with Local
Authorities Included in
the Operating Record?
265.37

XV. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 265 Subpart D

- (A) Does the Contingency Plan Contain the
Following Information:

1. The actions facility personnel
must take to comply with
§264.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part.)

XIS 15 MINUTES UPDATED
CONTINGENCY PLAN 12/1/00

2. Arrangements agreed to by Local
police departments, fire departments
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §265.37?

X

VI . MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING -265 Subpart E

Yes No Not Inspected See Remark Number

A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?

X

2. Are records of past shipments retained for 3 years?
265.71(5)

X

NOT APPLICABLE

10

(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?
265.72

NOT APPLICABLE

11

(C) Operating Record

Does the facility maintain an operating record at the site as required in §265.73?

X

(D) Availability, Retention and Disposition of Records

Are all records available at the site for inspection as required in §265.74?

X

Appx 133252

VII . CLOSURE AND POST CLOSURE - 265 Subpart G and H

NOT APPLICABLE

(A) Closure and Post Closure

1. Closure Plan Available for Inspection by May 19, 1981?
265.112(a)

2. Has this plan been submitted to the Regional Administrator?
265.112(c)

3. Has Closure begun?
265.112(c)

4. Is closure cost estimate available by May 19, 1981?
265.142

(B) Post Closure Care and Use of Property
- Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?

265.117

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection
262

1. General Information:

(A) Installation Name: PARKER DIVISION, CALMETAL INDUSTRIES
(B) Street: 32100 STEPHENSON HWY.
(C) City: ROYAL OAK (D) State: MICHIGAN (E) Zip Code: 48071
(F) Phone: 583-9300 (G) County: OAKLAND

(H) Operator: PARKER DIVISION
(I) Street: 32100 STEPHENSON HWY.
(J) City: ROYAL OAK (K) State: MICHIGAN (L) Zip Code: 48071
(M) Phone: 583-9300 (N) County: OAKLAND

(O) Owner: HOOVER CHEMICAL AND PLASTICS
(P) Street: 32100 STEPHENSON HWY.
(Q) City: ROYAL OAK (R) State: MICHIGAN (S) Zip Code: 48071
(T) Phone: 583-9300 (U) County: OAKLAND

_____ Federal _____ Municipal X Private
(V) Type of Ownership: _____ State _____ County

(W) Date of Inspection: 03-11-81 Time of Inspection (From) 10 AM (To) 1 PM

(X) Weather Conditions: CLEAR, BREEZY, CLOUDY

Telephone

1950-1951

583 - 7300

Telephone

(412) 666-2700

(2.0) 379-769.2

(G) Comments:

Form 2 - Page 2

111. MANIFEST

Yes

No

Not
Inspected

See Remark
Number

(A) Are copies of the Manifest
available?
262.23(a)3

(B) Does the Manifest contain the
following information:

1. Manifest document number?
262.21(a)1

2. Name, mailing address, telephone
number, and EPA ID Number of
Generator?
262.21(a)2

3. Name and EPA ID Number of
Transporter(s)?
262.21(a)3

4. Name, Address, and EPA ID
Number of Designated permitted
facility and alternate facility?
262.21(a)4

5. The description of the waste(s)
(DOT shipping name, DOT hazard class,
DOT identification number)?
262.21(a)5 DOT information in CFR 49 172.101, 172.202 and 172.203

6. The total quantity of waste(s) and
the type and number of containers
loaded?
262.21(a)6

7. Required Certification?
262.21(b)

8. Required Signatures?
262.23(a)1

(C) Does the Owner or Operator Submit
Exception Reports when Needed?
262.42

IV. PRE-TRANSPORT REQUIREMENTS - 262 Subpart C

— NOT APPLICABLE AS YET —

(A) Is Generator Packaging waste in
accordance with DOT Regulations?
262.30 49 CFR Parts 173.178 and 179

(B) Are waste packages marked and labeled
in accordance with DOT Regulations
concerning hazardous waste materials?
262.31 49 CFR Part 172

(C) If required, are placards available
to transporter?
262.33 49 CFR Part 172 Subpart F

Yes

No

Not
InspectedSee Remark
Number

(c) Pre-shipment Accumulation:

1. Are containers marked with start of accumulation date? X
- 262.34(a)
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days? X
- 262.34(a): If no, the facility must be storage or disposal facility 262.34(b)
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? X
- THE WEEKLY INSPECTIONS HAVE NOT YET STARTED.
4. Are wastes stored in tanks managed according to the following:
- STORAGE IS ONLY IN DRUMS - NOT APPLICABLE -
- a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?
- 265.192(b)
- b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?
- 265.192(c)
- c. Do continuous feed systems have a waste-feed cutoff?
- 265.192(d)
- d. Are required daily and weekly inspections done?
- 265.194
- e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?
- 265.198, 265.17
- f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply)
- 265.199

14

If generator is also TSD, omit section V

	Yes	No	Not Inspected	See Remark Number
Do Personnel training records include: 265.16				
1. Job Titles? 265.16(d)1				
2. Description of Training? 265.16(d)3				
3. Records of Training? 265.16(d)4				
Is Personnel Training Completed within the Required Time Frame?				
B. Preparedness and Prevention 265 Subpart C				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31				
2. Does the Facility have the following equipment?				
a. Alarm system? 265.32(a)				
b. Telephone or 2-Way Radios? 265.32(b)				
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32(c)				
Indicate the volume of water and/or foam available for fire control 265.32(d)				
Units: _____				
<hr/>				
3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment? 265.33				
b. Is emergency equipment Maintained in Operable Condition? 265.33				

Yes

No

Not
InspectedSee Remark
Number

4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?
265.34(a)
5. Is there adequate Aisle Space for unobstructed Movement?
265.35
6. Are arrangements with local authorities included in the operating record?
265.37

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

(C) Contingency Plan and Emergency Procedure

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

_____	_____	_____	_____
-------	-------	-------	-------

c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.
265.52(d)

_____	_____	_____	_____
-------	-------	-------	-------

d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?
265.52(e)

_____	_____	_____	_____
-------	-------	-------	-------

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

_____	_____	_____	_____
-------	-------	-------	-------

265.52(f)

	Yes	No	Not Inspected	See Report Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations? 265.53	_____	_____	_____	_____
3. Emergency Coordinator 265.55				1
a. Is the Facility Emergency Coordinator Identified?	_____	_____	_____	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	_____	_____	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	_____	_____	_____	_____

VI. RECORDKEEPING

- (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?
265.71(a)5

NOT APPLICABLE AS YET

VII. INTERNATIONAL SHIPMENTS

- (A) Has the Installation Imported or Exported Hazardous Waste?
262.50

X

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, has a generator:
- Notified the Administrator in writing?
262.50(b)1
 - Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?
262.50(b)2

	Yes	No	Not Inspected	See Remark Number
c. Met the Manifest requirements? 262.50(b)3	_____	_____	_____	_____
2. Importing Hazardous Waste, has the generator: 262.50(d)	_____	_____	_____	_____
a. Met the manifest requirements?	_____	_____	_____	_____

VIII. PREPARER INFORMATION

Name: KEVIN L. TOLLIVER

Title: AIR QUALITY ENGINEER

Phone Number: (313) 666-2700

MARKS: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 3 - Transporter Inspection
(263)

I. General Information:

(A) Transporter Name: _____

(B) Street: _____

(C) City: _____ (D) State: _____ (E) Zip Code: _____

(F) Phone: _____ (G) County: _____

(H) Operator: _____

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: _____

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

(V) Type of Ownership: _____ Federal _____ Municipal _____ Private
_____ State _____ County

(W) Date of Inspection: _____ Time of Inspection (From) _____ (To) _____

(X) Weather Conditions: _____

(Y) Person(s) Interviewed

Title

Telephone

(Z) Inspection Participants

Title

Telephone

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) _____ Generator (Form 2)

(B) _____ Chemical, Physical and
Biological Treatment (Form 4)

(C) _____ Storage (Form 5)

(D) _____ Landfill (Form 6)

(E) _____ Incineration (Form 7)

(F) _____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. RECORDKEEPING

Yes

No

Not
Inspected

See Remark
Number

(A) Are Copies of the Completed
Manifest(s) or Shipping Paper(s)
Available for Review and
Retained for Three Years?

263.22(a)

	Yes	No	Not Inspected	See Remarks Number
Does the Transporter Record on the Manifest the Date the Waste left U.S.? 263.20(f)1	_____	_____	_____	_____
B. Are Completed Manifest(s) on File? → SIGNED 263.22(a) and 263.20(f)2	_____	_____	_____	_____

V. MISCELLANEOUS

- A. Does Transporter Transport Hazardous Waste Into the U.S. from Abroad?
263.10(c)1
- B. Does the Transporter Mix Hazardous Waste of Different DOT Shipping Descriptions by Placing them into a Single Container?
263.10(c)2

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and Must comply with the Generator Regulations.

263.10(c)

VI. PREPARER INFORMATION

A. Name: _____

Title: _____

Phone No.: _____

Remarks: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment
265 - Subpart Q

I. General Information

(A) Facility Name: PARKER DIVISION, CHEMICAL INDUSTRIES
(B) Street: 32100 STEPHENSON HWY.
(C) City: ROYAL OAK (D) State: MICHIGAN (E) Zip Code: 48071
(F) Phone: 583-9300 (G) County: OAKLAND

II. Chemical, Physical and Biological
Treatment (Subpart Q)
265

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401(b)	X			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? 265.401(c)	X			
3. Has the owner or operator addressed the waste analysis requirements of 265.402? and 265.13			NOT APPLICABLE	16
4. Are inspection procedures followed according to 265.403?	X			
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	X		NO REACTIVE WASTES INVOLVED IN PROCESSES	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		X		17

WASTES ONLY TREATED THROUGH RESEARCH LABS WHICH WOULD BE TREATED THROUGH
INTO THE MUNICIPAL SANITARY SEWER THIS TREATMENT IS NOT APPLICABLE
EXCEPT FOR LAB WASTES WHICH ARE NOT TREATED

NOT APPLICABLE

III. Land Treatment (Subpart M) 265

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation? 265.272(a)				
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? 265.272(b&c)				
3. Is waste analysis according to 265.273? and 265.13				
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278(a)				
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278(b and c)?				
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility? 265.279				
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? 265.281				
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.) 265.282				

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

265 - Subparts I, J, K, and L

I. General Information

) Facility Name: PARKER DIVISION - OXYMETAL INDUSTRIES
) Street: 32100 STEPHANSON HWY
) City: ROYAL OAK (D) State: MICHIGAN (E) ZIP Code 48071
) Date of Inspection: 03-11-81

II. Storage Facility Standards (Part 265)

1. Facilities which store containers of hazardous waste (Subpart I) 265

	YES	NO	NOT IN- SPECTED	REMARK #
1. Are containers in good condition? 265.171	/			
2. Are containers compatible with waste in them? 265.172	/			
3. Are containers stored closed? 265.173(a)	X			
4. Are containers managed to prevent leaks? 265.173(b)	/			
5. Are containers inspected weekly for leaks and defects? (AND RECORDED IN LOGS?) 265.174	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? 265.176	X			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.177(a)	X			
8. Are containers of incompatible wastes separated or protected from each other by physical barriers or sufficient distance? 265.177(c)		X	NOT APPLICABLE	

3. Facilities which store hazardous waste in tanks (Subpart J) NOT APPLICABLE

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192(b)				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 265.192(c)				

Do continuous feed systems have waste-feed cutoff?	265.192			
Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193(a)			
Are required daily and weekly inspections done?	265.194			
Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.198			
Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	265.199			

Facilities which store hazardous waste in surface impoundments (Subpart K) 265

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	265.222			
2. Do earthen dikes have protective cover?	265.223			
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?	265.225(a)			
4. Is the freeboard level inspected at least daily?	265.226(a)1			
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	265.226(a)2			
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.299(a)1			
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	265.230			

Facilities which store hazardous waste in waste piles (Subpart L) 265

1. Are waste piles covered or protected from the wind?	265.251			
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	265.252			
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	265.253			
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.256(a)1			

Continued on next page

			SPECTED	
5. Are piles of reactive or igni ble waste protected? 265.256(a)2				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257(a)				
7. Are piles of incompatible waste protected by barriers or distance from other waste? 265.257(b)				

MID 057676-124

C. Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81?
265.112(a)
2. Has this plan been submitted to the Regional Administrator?
265.112(c)
3. Has Closure begun?
265.112(c)
4. Is Closure cost estimate available by 5-19-81?
265.142(a)

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

D. Special requirements for ignitable or reactive waste

Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? 265.312

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

_____	_____	_____	_____
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E. Special requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?
265.313

If not, the provisions of 40 CFR 265.17(b) apply.

_____	_____	_____	_____
_____	_____	_____	_____

F. Special Requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?
265.314(a)
2. Does the landfill have a chemically and physically resistant liner system?
265.314(a)1

_____	_____	_____	_____
_____	_____	_____	_____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
FORM 6 - LANDFILL INSPECTIONS

265 - Subpart N

I. General Information

(A) Facility Name: _____
(B) Street: _____
(C) City: _____ (D) State: _____ (E) Zip Code: _____
(F) Date of Inspection: _____

II. Landfills

Yes No Not Inspected See Remark Number

(A) General Operating Requirements -
Does the facility provide the following:

- *1. Diversion of run-on away from active portions of the fill? 265.302(a)
- *2. Collection of run-off from active portions of the fill? 265.302(b)
- *3. Is collected run-off treated? 265.302(b)
- 4. Control of wind dispersal of hazardous waste? 265.302(d)

dispersal

(* Effective 11-19-81)

(B) Surveying and Recordkeeping -
Does the Operating Record Include:

- 1. A map showing the exact location and dimensions of each cell? 265.309(a)
- 2. The contents of each cell and the location of each hazardous waste type within each cell? 265.309(b)

	Yes	No	Not Inspected	See Remark Number
3. Does the landfill have a functional leachate collection system? 265.314(a)1	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill? 265.314(a)2	_____	_____	_____	_____
G. Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? 265.315(a)	_____	_____	_____	_____

11/6/80